

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, et al.,                     )  
   )  
      Plaintiffs,                             )  
   )  
VS.   ) CIVIL ACTION  
   ) NO. 2:13-CV-00193  
RICK PERRY, et al.,                     )  
   )  
      Defendants.                             )

\*\*\*\*\*

ORAL DEPOSITION OF

MIGUEL ORTIZ

AUGUST 14, 2014

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ORAL DEPOSITION OF MIGUEL ORTIZ, produced as a  
witness at the instance of the Defendants and duly  
sworn, was taken in the above-styled and numbered cause  
on August 14, 2014, from 3:31 p.m. to 6:08 p.m., before  
Jodi Cardenas, RPR, CSR in and for the State of Texas,  
reported by computerized stenotype machine at the Office  
of the Attorney General of Texas, 209 West 14th Street,  
7th Floor, Austin, Texas, pursuant to the Federal Rules  
of Civil Procedure.

2	4
1 APPEARANCES	1 EXHIBITS
2	2
3 FOR THE PLAINTIFFS, MARC VEASEY, ET AL.:	3 NO. DESCRIPTION PAGE
4 Mr. Neil G. Baron	4 1 Notice of Deposition.....13
5 LAW OFFICE OF NEIL G. BARON	5 2 Notice of Deposition.....15
6 914 FM 517 West, Suite 242	6 3 Plaintiff's First Amended Complaint.....19
7 Dickinson, Texas 77539	7 4 Printout from LULAC Web Site.....24
8 (281) 534-2748	8 5 Printout from Texas Department of Public
9 neil@ngbaronlaw.com	9 Safety Web Site.....71
10	10
11 FOR THE DEFENDANTS:	11
12 Mr. Stephen L. Tatum, Jr.	12
13 ASSISTANT ATTORNEY GENERAL - OPINION COMMITTEE	13
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19 FOR THE UNITED STATES DEPARTMENT OF JUSTICE:	19
20 Mr. J. Eric Rich (Via Telephone)	20
21 UNITED STATES DEPARTMENT OF JUSTICE, VOTING SECTION	21
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23 Washington, DC 20530	23
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25 j.rich@usdoj.gov	25
3	5
1 INDEX	1 (Mr. Rich not present)
2 PAGE	2 MIGUEL ORTIZ,
3 Appearances.....2	3 having been first duly sworn, testified as follows:
4 MIGUEL ORTIZ	4 EXAMINATION
5 Examination by Mr. Tatum.....5	5 BY MR. TATUM:
6 Changes and Signature.....89	6 Q. Good afternoon. My name is Stephen Tatum. I'm
7 Reporter's Certificate.....91	7 an assistant attorney general representing the
8	8 defendants in this matter. It's August 14th. The time
9	9 is 3:57, or thereabouts. We're here at the attorney
10	10 general's office in Austin, Texas, on the 7th floor.
11	11 Would you please state your -- state and
12	12 spell your full name for the record, please?
13	13 A. Miguel A. Ortiz. M-I-G-U-E-L, A, O-R-T-I-Z.
14	14 Q. And, Mr. Ortiz, where do you reside?
15	15 A. San Antonio, Texas.
16	16 Q. And are you represented by counsel today?
17	17 A. He's right next to me.
18	18 Q. And --
19	19 A. Neil.
20	20 Q. Neil Baron?
21	21 A. Neil Baron.
22	22 Q. Okay. Mr. Ortiz, have you ever been deposed
23	23 before?
24	24 A. No. I've been on many depositions on the other side
25	25 but not -- I don't -- I don't think I've ever been in a

<p style="text-align: right;">6</p> <p>1 depo in anything.</p> <p>2 Q. You've never been deposed yourself?</p> <p>3 A. No.</p> <p>4 Q. Okay.</p> <p>5 A. I don't think so.</p> <p>6 Q. Okay. I'll go over some quick ground rules</p> <p>7 that will cover this deposition. I'm going to be asking</p> <p>8 you questions, and I need to give -- I need for you to</p> <p>9 give me verbal answers to those questions. So please</p> <p>10 avoid nodding your head or shaking your head or saying</p> <p>11 "uh-huh" or no things like that. The whole idea is we</p> <p>12 need to speak clearly and give the court reporter a</p> <p>13 chance to transcribe an accurate record of what we say</p> <p>14 here today. Do you understand?</p> <p>15 A. Uh-huh. Yes, sir.</p> <p>16 Q. In that regard, we need to try to avoid talking</p> <p>17 over each other. So even if you anticipate the answer</p> <p>18 to one of my questions, please allow me to finish my</p> <p>19 question before you begin to answer, and I'll do the</p> <p>20 same for you. I'll -- I'll wait until you finish your</p> <p>21 answer before I ask another one. Do you understand?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Okay. That may be easier said than done, but I</p> <p>24 just ask that we do our best to avoid talking over each</p> <p>25 other. If you don't understand a question that I ask or</p>	<p style="text-align: right;">8</p> <p>1 from answering my questions truthfully and accurately?</p> <p>2 A. No.</p> <p>3 Q. Okay. Mr. Ortiz, would you mind --</p> <p>4 A. No.</p> <p>5 Q. -- putting it on the table there?</p> <p>6 A. Yes, sir.</p> <p>7 Q. Thank you. Just a little distracting.</p> <p>8 Could you tell me what you did to prepare</p> <p>9 for this deposition today?</p> <p>10 A. What did I do to prepare?</p> <p>11 Q. Yes.</p> <p>12 A. I got your deposition notice, so I know what it</p> <p>13 is you're asking. I review part of the file but not</p> <p>14 much. I don't have too much time to read everything,</p> <p>15 so...</p> <p>16 Q. About how much time did you spend reviewing</p> <p>17 those materials?</p> <p>18 A. An hour and a half, two hours maybe.</p> <p>19 Q. And when was that?</p> <p>20 A. Between yesterday and today.</p> <p>21 Q. Did you have any meetings with counsel or</p> <p>22 anyone else?</p> <p>23 A. Just -- we had a conference call.</p> <p>24 Q. And when was that?</p> <p>25 A. The day before yesterday.</p>
<p style="text-align: right;">7</p> <p>1 you didn't hear it clearly, please say so. I'll gladly</p> <p>2 rephrase it or restate it or do whatever I can to make</p> <p>3 sure you understand it. Do you understand that?</p> <p>4 A. Yes, sir.</p> <p>5 Q. Okay. Your attorney may object to one of my</p> <p>6 questions, but unless he specifically instructs you not</p> <p>7 to answer, you're still required to answer my question.</p> <p>8 Do you understand?</p> <p>9 A. Yes, sir.</p> <p>10 Q. Okay. Do you understand that you are under</p> <p>11 oath, which means that you must tell the truth, and that</p> <p>12 you are under the -- or that you are subject to the</p> <p>13 penalty of perjury if you do not?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Okay. Mr. Ortiz, how are you feeling today?</p> <p>16 A. I'm good.</p> <p>17 Q. Are you suffering from any illnesses that would</p> <p>18 prevent you from answering my questions truthfully and</p> <p>19 accurately?</p> <p>20 A. No.</p> <p>21 Q. Are you taking any medications that might</p> <p>22 prevent you from answering my questions truthfully and</p> <p>23 accurately?</p> <p>24 A. No.</p> <p>25 Q. Is there anything else that might prevent you</p>	<p style="text-align: right;">9</p> <p>1 Q. And about how long was that conference call?</p> <p>2 A. It was the day before yesterday or yesterday.</p> <p>3 One of those two days. I think it was the day before</p> <p>4 yesterday.</p> <p>5 Q. About how long was that conference call?</p> <p>6 A. I'm not sure. Maybe 25 minutes, 30 minutes,</p> <p>7 probably less.</p> <p>8 Q. You mentioned this already, but did you bring</p> <p>9 any documents with you here today?</p> <p>10 A. No.</p> <p>11 Q. Okay. Is there anything else you did to</p> <p>12 prepare for this deposition that you didn't already</p> <p>13 mention?</p> <p>14 A. No.</p> <p>15 Q. Okay. Mr. Ortiz, can you tell me when and</p> <p>16 where you were born?</p> <p>17 A. I was born in Fort Benning, Georgia, on</p> <p>18 September 29th, '67.</p> <p>19 Q. What brought you to Texas?</p> <p>20 A. The United States Army. I was active duty when</p> <p>21 I got to Texas.</p> <p>22 Q. Are you currently on active duty?</p> <p>23 A. No.</p> <p>24 Q. Can you tell me a little bit about your</p> <p>25 educational background?</p>

10

1 A. Civilian or military?  
 2 Q. Either.  
 3 A. Civilian, I have a bachelor's degree in  
 4 business. I have a master's in accounting, and I have a  
 5 law degree.  
 6 Q. Are you currently licensed to practice law?  
 7 A. Yes, sir.  
 8 Q. In the State of Texas?  
 9 A. Yes, sir.  
 10 Q. And you mentioned a military educational  
 11 background. Can you tell me a little bit about that?  
 12 A. I was a nuclear biological chemical specialist  
 13 for the United States Army. So I got a whole bunch of  
 14 education on that. Basic noncommissioned officer  
 15 school. I mean, there are a lot. Primary leadership  
 16 school, events, courses on chemical, biological, and  
 17 nuclear subjects.  
 18 THE REPORTER: Nuclear subjects?  
 19 THE WITNESS: Nuclear, yeah.  
 20 Q. (BY MR. TATUM) And when were you discharged  
 21 from active duty?  
 22 A. June 2000 -- hold on a second.  
 23 Yeah. No. Actually, I graduated in --  
 24 yeah. June 2000.  
 25 Q. Mr. Ortiz, are you currently employed?

12

1 I'm not sure about that, so --  
 2 Q. Somewhere around --  
 3 A. -- don't hold me to that one. But it's been  
 4 about four or five years now.  
 5 Q. And as the State of Texas legal adviser for  
 6 LULAC, what are your official responsibilities?  
 7 A. I'm responsible to advise the executive board  
 8 as to any legal matters that affects LULAC directly or  
 9 that LULAC wants to get involved to or with or partner  
 10 with, depending on the issues. I give the board an  
 11 advice, but it's still got to be approved by national  
 12 anyway. So it's sort of like I will be like the eyes of  
 13 the legal national -- nationwide for the state board.  
 14 Q. And are you the only legal adviser to the Texas  
 15 state board?  
 16 A. Yes.  
 17 Q. Is that a paid position?  
 18 A. It is a position, yes.  
 19 Q. Do you get compensated for your work?  
 20 A. No. It's a voluntary basis. And I don't get  
 21 paid by LULAC to do my job, if that's what you mean.  
 22 Q. Yes.  
 23 A. But if there's a lawsuit involved that I'm the  
 24 lead counsel on it -- of course, it depends on what the  
 25 situation is -- then I would get compensated for my work

11

1 A. Yes.  
 2 Q. And who is your employer?  
 3 A. Ortiz Law Office, PC.  
 4 Q. And is that law office based in San Antonio?  
 5 A. San Antonio, and we have an office in Belton,  
 6 and another one in Puerto Rico.  
 7 Q. Okay. What kind of law do you practice?  
 8 A. Primary -- it depends. Fort Hood office mainly  
 9 is family law. San Antonio office is a combination of  
 10 personal injury and family law. And then Puerto Rico  
 11 depends on the cases.  
 12 MR. BARON: Vacation law.  
 13 (Laughter)  
 14 Q. (BY MR. TATUM) What is your role at LULAC?  
 15 A. I'm the state -- the state legal adviser. The  
 16 State of Texas legal adviser.  
 17 Q. And how long have you held that role?  
 18 A. I want to say a little over two years. A  
 19 little more than two years, two years and a half. For  
 20 sure, more than two years.  
 21 Q. Okay. Did you have any other role with LULAC  
 22 before that?  
 23 A. I was a member, just a regular member of LULAC.  
 24 Q. When did you first become a member of LULAC?  
 25 A. Wow. '10. 2010, I think. Not too far back.

13

1 on that particular case, but not necessarily from LULAC.  
 2 Maybe from the defendants or something like that.  
 3 Q. Okay. And you mentioned that you advise the  
 4 executive board of LULAC?  
 5 A. Texas LULAC.  
 6 Q. Of Texas LULAC. Can you tell me who comprises  
 7 the executive board of Texas LULAC?  
 8 A. Okay. The state director, state vice director,  
 9 I guess, the second director. Then you have the  
 10 treasurer. Then you have the district directors.  
 11 If memory serves me correctly, it's 21  
 12 districts in the State of Texas, so that would be 21  
 13 members. That's for the executive board. Then you have  
 14 the actual board, which is comprised of more members,  
 15 which is the appointees, such as the chair of the  
 16 committees, state-level committees, and things like  
 17 that.  
 18 Q. And do you advise that regular board in  
 19 addition to the executive board?  
 20 A. Yes.  
 21 Q. Okay.  
 22 (Exhibit No. 1 marked)  
 23 Q. (BY MR. TATUM) Mr. Ortiz, I'm handing you  
 24 what's been marked as Exhibit 1. If you would, take a  
 25 quick minute and just look over this document that I've

<p style="text-align: right;">14</p> <p>1 just handed you, please.</p> <p>2 A. Okay.</p> <p>3 Q. Do you recognize this document?</p> <p>4 A. I'm not sure because it has a different date on</p> <p>5 it.</p> <p>6 Q. Would you turn to Page 2, please?</p> <p>7 A. Right.</p> <p>8 Q. And would you read for me there, kind of near</p> <p>9 the bottom of the page, the language that's in capital,</p> <p>10 bold letters?</p> <p>11 A. "Defendant Notice of Intent to Take Oral</p> <p>12 Deposition of League of United Latin American Citizens,</p> <p>13 LULAC." The date is June 3rd, 2014.</p> <p>14 MR. BARON: Hold on. Let's go off the</p> <p>15 record.</p> <p>16 (Off the record)</p> <p>17 (Mr. Rich present via telephone)</p> <p>18 MR. TATUM: Okay. We've had someone join</p> <p>19 us over the phone. Do you want to introduce yourself</p> <p>20 real quick?</p> <p>21 MR. RICH: Eric Rich representing United</p> <p>22 States.</p> <p>23 MR. TATUM: Thank you.</p> <p>24 Q. (BY MR. TATUM) Okay. Before we went off the</p> <p>25 record, Mr. Ortiz, I handed you an exhibit that's been</p>	<p style="text-align: right;">16</p> <p>1 those paragraphs?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Would you take just a quick moment and review</p> <p>4 those paragraphs, please?</p> <p>5 A. You want me to read them?</p> <p>6 Q. You don't have to read them out loud, but just</p> <p>7 look over them and make sure you understand what's</p> <p>8 contained in each one.</p> <p>9 A. Okay.</p> <p>10 Q. Having had a chance to review the topics</p> <p>11 contained in this notice, are you aware that you've been</p> <p>12 designated by the League of United Latin American</p> <p>13 Citizens, which I'll refer to from here on in as LULAC,</p> <p>14 to testify and give truthful and binding answers on its</p> <p>15 behalf regarding the topics described in this notice?</p> <p>16 A. To those that I have knowledge, yes.</p> <p>17 Q. Okay. Are there any topics contained in this</p> <p>18 notice that you do not have knowledge of?</p> <p>19 A. Personal knowledge you mean or --</p> <p>20 Q. Personal or general knowledge.</p> <p>21 A. Well, there's several that I don't have direct</p> <p>22 personal knowledge of.</p> <p>23 Q. Can you tell me which ones those are?</p> <p>24 A. The factual basis of contentions. I personally</p> <p>25 don't have any personal knowledge.</p>
<p style="text-align: right;">15</p> <p>1 marked as Exhibit 1. I think we can put that aside for</p> <p>2 a second -- or for the rest of this deposition.</p> <p>3 (Exhibit No. 2 marked)</p> <p>4 Q. (BY MR. TATUM) I'm now handing you what's been</p> <p>5 marked as Exhibit 2. If you would please, take a moment</p> <p>6 to look this over.</p> <p>7 A. Okay.</p> <p>8 Q. Mr. Ortiz, do you recognize this document?</p> <p>9 A. Yes.</p> <p>10 Q. And what is this document?</p> <p>11 A. That's the notice I received for this</p> <p>12 deposition.</p> <p>13 Q. It's the notice of intention to take oral</p> <p>14 deposition of the League of United Latin American</p> <p>15 Citizens. Correct?</p> <p>16 A. Yes, sir.</p> <p>17 Q. Did you review this notice in preparation for</p> <p>18 this deposition?</p> <p>19 A. Yes, sir.</p> <p>20 Q. If you would please, turn to Page 4. Are you</p> <p>21 there at Page 4?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Okay. At the bottom of Page 4, there's a</p> <p>24 heading that says "Matters," and that is followed by a</p> <p>25 series of numbered paragraphs from 1 to 29. Do you see</p>	<p style="text-align: right;">17</p> <p>1 Q. Is that paragraph No. 1?</p> <p>2 A. Yes. The identity of the members. I don't --</p> <p>3 I don't know every member, so I don't know that. So</p> <p>4 three, four, five, six -- I mean, it's over a hundred</p> <p>5 thousand members, so I do not know the identity of the</p> <p>6 members.</p> <p>7 Q. Okay. We'll get to that.</p> <p>8 A. All right. I mean, I don't -- 15, I -- I'm not</p> <p>9 sure what is it you want there.</p> <p>10 Q. Do you not understand topic 15?</p> <p>11 A. I don't understand your request. Any</p> <p>12 calculation reports, audits, estimates, projections, or</p> <p>13 audit analysis related to the effect of SB14 on minority</p> <p>14 voters or on voters who are members of the language</p> <p>15 minority group from 2005 to the present.</p> <p>16 MR. BARON: Just for the record, Miguel.</p> <p>17 THE WITNESS: Yes.</p> <p>18 MR. BARON: I mean, I think that obviously</p> <p>19 should say "prepared by LULAC" or "done by LULAC."</p> <p>20 Okay. So I -- I mean, I don't know if that's where</p> <p>21 you're hung up or not.</p> <p>22 THE WITNESS: I mean, I don't know</p> <p>23 what's -- I really don't know what it's asking. I'm</p> <p>24 just taking the language as written so --</p> <p>25 MR. BARON: Right. Sure.</p>

18

1 THE WITNESS: And I think that's --  
 2 MR. BARON: But to the extent -- but to  
 3 the extent they were referring specifically, I mean,  
 4 he's going to ask you about whether -- what was or was  
 5 not done by LULAC, and you either have knowledge or --  
 6 THE WITNESS: Sure. I totally understand.  
 7 MR. BARON: -- you don't have knowledge  
 8 about whether LULAC as a statewide entity --  
 9 THE WITNESS: And it's -- don't -- maybe  
 10 if we go and -- as you go and I -- because right now I  
 11 don't know what your questions are --  
 12 Q. (BY MR. TATUM) Okay.  
 13 A. -- directly on those points. So I cannot tell  
 14 you I don't know anything, I know a little --  
 15 Q. Okay.  
 16 A. -- I know a lot. I got some.  
 17 Q. Sure. In the interest of moving this along,  
 18 why don't I just ask, are there any topics that are  
 19 listed here that you to your knowledge have not been  
 20 designated to testify to?  
 21 A. Not that I know.  
 22 Q. Okay. And as we go along, if you don't have  
 23 any knowledge of something that I ask you, just state as  
 24 much on the record.  
 25 A. Right. Okay.

20

1 A. I -- I have no knowledge whether it is accurate  
 2 or not.  
 3 Q. Mr. Ortiz, can you tell me when LULAC first  
 4 learned of this lawsuit?  
 5 A. I'm not sure. I mean, they are -- LULAC is a  
 6 plaintiff, so I hardly knew when it was filed. Is that  
 7 what you're asking me?  
 8 Q. Yes.  
 9 A. Well, they're plaintiffs, so they knew about it  
 10 when they filed it.  
 11 Q. And how was the decision made to join this  
 12 lawsuit?  
 13 A. The decisions on -- decisions made to file  
 14 lawsuits are made by the executive board of the national  
 15 executive board for any lawsuit at any level that has  
 16 the name of LULAC. That's -- I can give you an example.  
 17 If Texas has an issue, then Texas has to present that  
 18 issue to the executive board, the national board, then  
 19 it gets -- goes to them, and they vote, and they decide  
 20 whether they're going to file or not, or they're going  
 21 to participate or not in any lawsuit, not just in this  
 22 particular one. So that's how they -- that's how  
 23 it's -- that's how it works within the organization.  
 24 Q. So the Texas executive board proposed the  
 25 initiating of this lawsuit to the national executive

19

1 MR. BARON: We'll decide if I really need  
 2 to chase that particular topic or not at a later date.  
 3 (Exhibit No. 3 marked)  
 4 Q. (BY MR. TATUM) Mr. Ortiz, I'm handing you  
 5 what's been marked as Exhibit 3. Would you please take  
 6 a moment to look over this document, please?  
 7 A. Okay.  
 8 Q. Mr. Ortiz, do you recognize what this document  
 9 is?  
 10 A. I mean, this is the pleadings. Maybe the live  
 11 pleadings in this suit.  
 12 Q. Sorry.  
 13 A. Go ahead.  
 14 Q. I'll represent to you that this is the  
 15 plaintiff's, including LULAC's, first amended complaint  
 16 that was filed in this lawsuit.  
 17 A. Okay.  
 18 Q. Have you seen this complaint before?  
 19 A. I have.  
 20 Q. Did you assist in any way with the  
 21 preparation -- preparation of this complaint?  
 22 A. No.  
 23 Q. Do you have any reason to believe that any of  
 24 the information contained in this complaint is not  
 25 accurate?

21

1 board. Is that correct?  
 2 A. Right. And -- yes. The state director will  
 3 take whatever the state board resolved through their  
 4 meetings and present that to the national, and then  
 5 national will vote yea or nay, and then it gets filed  
 6 depending on -- depending on what it is. You know, if  
 7 it's a state-level lawsuit, if it's a national-level  
 8 lawsuit. Sometimes national can say, okay, we're going  
 9 to leave it to the state level. If state level wants to  
 10 pursue it, then state level would pursue it. Or they  
 11 can say, no, we're not going to pursue it or, yes, we're  
 12 going to pursue it, and we're going to do it at the  
 13 national level. So it all depends what type of case is  
 14 it.  
 15 Q. And how did the Texas executive board of LULAC  
 16 decide to initiate this lawsuit and present it to the  
 17 national board?  
 18 A. This particular one or in general?  
 19 Q. This one (indicating).  
 20 A. Well, I wasn't -- I wasn't present on that day,  
 21 so I cannot tell you what happened on that day.  
 22 Q. Okay.  
 23 A. I -- I had no personal knowledge of how that  
 24 happened. I can tell you that the organization is  
 25 somewhat consistent or doesn't deviate from the process



22

1 often. So if I follow the process that I have followed  
 2 while I've been involved, then it will be something  
 3 similar to what I just explained to you.  
 4 Q. In considering whether to seek the approval of  
 5 the national executive board to initiate this lawsuit,  
 6 did the Texas board of LULAC consider the input of its  
 7 members?  
 8 A. Right. Well, the --  
 9 MR. BARON: I'm going to object to form.  
 10 And you can go ahead and answer. I think that -- I'll  
 11 let him answer. I'll just object to form.  
 12 THE WITNESS: I think you've got to --  
 13 it's the structure of the organization first. That  
 14 way -- because its members of -- members of the  
 15 organization can attend any meeting. They are not  
 16 executive meetings. They're open. And anyone can  
 17 address the board to whatever issues they may have.  
 18 Usually the state directors will bring the issues that  
 19 affect that district. I mean, let me correct that.  
 20 The district directors will bring to the  
 21 state board whatever issues these members or the  
 22 district members brings to them, and they present it to  
 23 the board, and then the board with all the directors, I  
 24 guess, opens that issue for discussion. It gets  
 25 discussed, and then it puts it to vote. Sometimes there

24

1 A. If you say that. LULAC represents all  
 2 Hispanics or minorities. The premises of the foundation  
 3 of the organization was to protect the rights of Latin  
 4 Americans and minorities in general. You don't have to  
 5 be Hispanic to be a minority, so whomever gets affected.  
 6 And LULAC believes that a particular issue, a particular  
 7 law, a particular point is against -- or affects the  
 8 rights of the minorities and the community in general,  
 9 then they get involved. So that's the policy. That's  
 10 the general policy.  
 11 Q. Okay. That presents a good opportunity to  
 12 introduce my next exhibit.  
 13 (Exhibit No. 4 marked)  
 14 Q. (BY MR. TATUM) I'm handing you what's been  
 15 marked as Exhibit 4. Mr. Ortiz, I represent to you that  
 16 this is a screen shot captured printout of the LULAC Web  
 17 site. Is that what this looks like to you?  
 18 MR. BARON: National or state?  
 19 THE WITNESS: This is national, I think.  
 20 Q. (BY MR. TATUM) I believe this is national.  
 21 A. It looks familiar, that it's -- it looks like  
 22 the national -- if I -- if I trust what it says on the  
 23 address up there --  
 24 Q. Uh-huh.  
 25 A. -- it says "lulac.org," and I have no reason to

23

1 are issues. There are attorney-client privilege, for  
 2 example. So we go into an executive meeting, where only  
 3 the executive members are present, just to keep that  
 4 confidentiality present.  
 5 So it all depends on what is discussed.  
 6 But any member can come to all these meetings and  
 7 express whatever concern they may have, regardless  
 8 whether they are members of the board or not.  
 9 Q. (BY MR. TATUM) So I guess what I -- what I'm  
 10 trying to get at is, how did LULAC's involvement in this  
 11 lawsuit originate. Was it something that was brought to  
 12 the board by an individual member, or was this an issue  
 13 that the board members realized themselves?  
 14 A. I cannot tell you. I wasn't -- I wasn't  
 15 present when that -- when it first came about. So I  
 16 cannot tell you at what point it was brought up  
 17 specifically and at what point it was voted. I cannot  
 18 tell you.  
 19 Q. Okay. Do you know if LULAC consulted with any  
 20 of the other named plaintiffs on the complaint that you  
 21 have in front of you before deciding to initiate this  
 22 lawsuit?  
 23 A. I don't have personal knowledge of that.  
 24 Q. Okay. Is LULAC representing the rights of its  
 25 members in this lawsuit?

25

1 doubt that this is a -- but I cannot tell you for sure.  
 2 It looks like that.  
 3 MR. TATUM: Can we go off the record just  
 4 for one second?  
 5 (Off the record)  
 6 Q. (BY MR. TATUM) Okay. If you would, please, on  
 7 Exhibit 4 here, on that first page, there's a title that  
 8 says "Frequently Asked Questions," and under that  
 9 there's a Paragraph 2 that says, "What is LULAC's  
 10 Mission?" Do you see that?  
 11 A. Yes.  
 12 Q. Can you read for me what it says under that?  
 13 A. "The mission of the League of United Latin  
 14 American Citizens is to advocate the economic condition,  
 15 education or attainment, political influence, housing,  
 16 health, and civil rights of the Hispanic population of  
 17 the United States."  
 18 Q. And is that -- if that is the mission of the  
 19 national LULAC, which I believe that this Web site  
 20 represents, is that mission shared by the Texas branch  
 21 of LULAC?  
 22 A. It's shared by the whole organization. There's  
 23 no deviation from anything.  
 24 Q. Okay.  
 25 A. It is -- the League of United Latin American

26

1 Citizens is one organization. It doesn't divide by --  
 2 it's not different organizations throughout the nation  
 3 of -- there's only one organization, one component, and  
 4 then just the members of --  
 5 Q. Okay.  
 6 A. -- how it's divided.  
 7 Q. But you stated that the Texas, I guess, branch  
 8 of LULAC, for lack of a better word, has its own  
 9 executive board. Is that correct?  
 10 A. Every state.  
 11 Q. Every state has its own executive board that  
 12 reports to the national board of LULAC?  
 13 A. Right. You have national, then you have  
 14 regional vice presidents. They're a member of the  
 15 national board. The national board is composed by the  
 16 national president, and then you have the vice  
 17 presidents which are regional, the southwest, the -- the  
 18 northwest, northeast, southeast. I think there are six  
 19 or seven. Wow. I forgot the other ones. But they're  
 20 divided by regions.  
 21 So each region will have their own vice  
 22 president, then that vice president will oversee seven,  
 23 eight states. And -- and then the states have their  
 24 directors with their boards. There's not a regional  
 25 board. There's not a southwest regional board. There's

27

1 just the vice president.  
 2 And then you get the state board. Then  
 3 the state board oversees the state -- the district  
 4 directors, and then each direct -- each district  
 5 director will have councils, and then each council will  
 6 have their own little directive or, you know, the  
 7 president or the council just to operate themselves.  
 8 But everybody -- it's one constitution for everybody.  
 9 One book, one rule, one view.  
 10 Q. Okay. So in this lawsuit, does LULAC represent  
 11 the interests of its members in the State of Texas, or  
 12 does it represent all members of LULAC?  
 13 A. I don't think there's a separation of that.  
 14 There is not a separation of who we -- it's the  
 15 organization.  
 16 Q. Okay.  
 17 A. So I don't know. I mean, I'm pretty sure that  
 18 Texas is included in this because it affects Texas,  
 19 so...  
 20 Q. Okay. I'm just -- I'm just trying to get an  
 21 understanding of the organization of LULAC.  
 22 A. Right, but it's only one membership. I mean,  
 23 Texas has probably the majority of the members in the  
 24 organization. It's the No. 1 state in membership.  
 25 MR. BARON: Without messing up the record,

28

1 I think -- so what you're telling us is that -- so if  
 2 I'm a Texas member of LULAC, I am a national member of  
 3 LULAC?  
 4 THE WITNESS: Right.  
 5 MR. BARON: And if I am a California  
 6 member of LULAC, I'm a national member of LULAC?  
 7 THE WITNESS: Right.  
 8 Q. (BY MR. TATUM) So there's different charters?  
 9 A. The charters -- you cannot -- you cannot  
 10 just -- in order to be a member of LULAC, you've got to  
 11 pay your national dues and your state dues, of course.  
 12 But the membership is issued by national.  
 13 Q. Okay.  
 14 A. That's it. Every member, no matter where  
 15 you're from, all states plus Puerto Rico, all members  
 16 are registered at the national level.  
 17 Q. Can you tell me, if you know, what the Texas  
 18 state membership dues are?  
 19 A. Like the membership dues?  
 20 Q. How much those are.  
 21 A. I cannot tell you with certainty. I think I  
 22 know, but I cannot bet on it, because it changes. But  
 23 you pay -- if you have a new council, a new council is  
 24 usually composed of 11 members or more. That's usually  
 25 where -- you know, you have -- may have a council that

29

1 has 30 members, but usually there are about ten or 11  
 2 members in each council. Each council has four  
 3 delegates to the national convention or to the state  
 4 convention. There is a 30 -- there is a 75 council  
 5 membership due. Like when you form a council, you've  
 6 got to pay national \$75 for that council.  
 7 Then you've got to pay \$30, I think. And  
 8 those \$30 are divided between national and state. I  
 9 think it's \$15 and \$15, if my memory serves me  
 10 correctly. So when the member pays national, it pays  
 11 \$75 for the initiation of the council. That's a  
 12 one-time fee. And then \$30 for every member every year.  
 13 The membership fee is paid every year.  
 14 Q. Can you tell me how one becomes a member of  
 15 LULAC?  
 16 A. If you're 18 years old, you can be a member of  
 17 LULAC. It doesn't require you to race, it doesn't  
 18 require you anything. You can -- we have members who  
 19 are nonHispanic members. So you fill out your  
 20 application.  
 21 THE REPORTER: Application?  
 22 THE WITNESS: The application.  
 23 THE REPORTER: Okay.  
 24 THE WITNESS: You have to be -- you have  
 25 to be -- you have to be a member of a council. You're



30

1 not going to have members of LULAC who are just a  
 2 general member, belongs to nobody kind of deal. That  
 3 doesn't exist, at least to my knowledge. So usually  
 4 what you see is you get one community person who wants  
 5 to make a supporting group for whatever issue and get  
 6 these people, and they as a group work around -- or make  
 7 the application, files it. So it's very simple. You  
 8 are age of 18 or more, then -- then you get the  
 9 endorsement of the council that you're going to belong  
 10 to, plus a member in good standing. So you -- you need  
 11 that referral or sponsor for you to come in.  
 12 Q. (BY MR. TATUM) And so if you were -- if  
 13 there's a council already established, and you're 18  
 14 years old, you fill out the application, you get the  
 15 sponsorship of that council, and then to join it, do you  
 16 pay the \$30?  
 17 A. Right.  
 18 Q. And that --  
 19 A. Because the council already have paid the \$75.  
 20 Q. Right. So to become a member and join that  
 21 council you pay \$30, and then that \$30, as you said, is  
 22 split 50/50 between national and state?  
 23 A. And state. I think it's \$30. I'm not a  
 24 hundred percent sure.  
 25 Q. Okay.

31

1 A. I think. I think it's \$30. Don't hold me on  
 2 the amount, but I think it's \$30.  
 3 Q. Okay. So when you say half of that \$30 --  
 4 we'll just say \$30 for now. When you say half of that  
 5 \$30 goes to state, is that the Texas executive board of  
 6 LULAC?  
 7 A. Right. It goes to their state fund.  
 8 Q. Okay. And who has control over that fund?  
 9 A. Of the state fund? The state.  
 10 Q. That would be the Texas executive --  
 11 A. Each -- each state. All states are the same.  
 12 They're all designed the same way, same structure,  
 13 same -- partial independence, I guess. They control  
 14 their own funding, they do their own fund-raising,  
 15 councils still do the same. A local council can open a  
 16 bank account and do their own fund-raising to contribute  
 17 to educational funds or things like that.  
 18 Q. Okay. Is LULAC -- is LULAC a partisan  
 19 organization?  
 20 A. A what?  
 21 MR. BARON: Object to form.  
 22 THE WITNESS: LULAC is -- what is it  
 23 again?  
 24 MR. BARON: He asked if they were a  
 25 partisan organization, and my objection is form,

32

1 vagueness.  
 2 Q. (BY MR. TATUM) Do you -- do you understand  
 3 what I mean when I say "a partisan organization"?  
 4 A. For a particular party or something like that?  
 5 Q. A particular political party, yes.  
 6 A. None. Actually, it's not. It's civil rights.  
 7 We do not get involved in direct politics.  
 8 MR. BARON: I'll withdraw my objection.  
 9 Q. (BY MR. TATUM) Does LULAC -- we talked about  
 10 members of LULAC. Does LULAC have people that it would  
 11 consider its constituents?  
 12 MR. BARON: I'm going to object to form.  
 13 THE WITNESS: I really don't understand  
 14 what --  
 15 Q. (BY MR. TATUM) Let me ask it another way.  
 16 Does LULAC serve anyone other than its  
 17 members?  
 18 A. The community as a whole.  
 19 Q. Including people who might not be members of  
 20 LULAC?  
 21 A. You're Hispanic, and LULAC is advocating for  
 22 Hispanic, and the result is positive, all Hispanics  
 23 benefit. It's not for the particular benefit of its  
 24 members. It's for a particular benefit of a class. I  
 25 guess you could say it that way.

33

1 Q. What kind of services does LULAC provide to its  
 2 members?  
 3 A. I think you need to be a little more specific.  
 4 When you say "services," what do you mean by "services"?  
 5 Q. When one becomes a member of LULAC --  
 6 A. Okay.  
 7 Q. -- what kinds of benefits or services come  
 8 along with that membership?  
 9 A. When you become a member of LULAC, you actually  
 10 are telling LULAC, I'm here to volunteer. So I think  
 11 it's -- LULAC doesn't benefit until -- it's a nonprofit.  
 12 LULAC -- whatever efforts LULAC makes, the end result  
 13 benefit will be the community as a whole. So when I --  
 14 for example, when -- I can tell you when I joined LULAC,  
 15 my purpose was to help with whatever issues I can help  
 16 with or whenever my skills were needed, to support  
 17 issues that affect Hispanics, all minorities as a whole.  
 18 So I don't receive any direct benefit from LULAC other  
 19 than, I guess, being part of a very respectful  
 20 organization.  
 21 Q. So would you say that LULAC is primarily a  
 22 volunteer organization?  
 23 A. Yes.  
 24 Q. Looking back at Exhibit 4 that you have in  
 25 front of you --

34

1 A. Yes.  
 2 Q. -- on that first page, Paragraph 3 there says,  
 3 "How does LULAC work toward achieving its mission." Do  
 4 you see that paragraph?  
 5 A. Yes, sir.  
 6 Q. Okay. And underneath that paragraph, the first  
 7 bullet point there says "Programming." Do you see that?  
 8 A. Yes, sir.  
 9 Q. And in that paragraph, it talks about some of  
 10 its programming areas, which include civic  
 11 participation, civil rights, economic development,  
 12 education, health, leadership, et cetera. Do you see  
 13 those?  
 14 A. Yes.  
 15 Q. Are those all activities that LULAC regularly  
 16 engages in?  
 17 A. Yes.  
 18 Q. The next one -- the next bullet point there  
 19 says "advocacy." Can you tell me a little bit more  
 20 about the advocacy activities of LULAC?  
 21 A. I can give you examples of -- example this  
 22 year, in October, LULAC every year tried to meet as many  
 23 congressmens (sic) and members of the legislature  
 24 nationwide. They -- legislature nationwide, to express  
 25 LULAC's concern about issues regarding all the subjects

36

1 A. They -- they advise the state board, for  
 2 example, as to what's coming to -- to Austin, what is  
 3 pending, what is going to go to vote, whether we need  
 4 people to support, to go talk to -- to show support, to  
 5 make a present -- things like that. Testify in  
 6 legislature hearings, if it's necessary. That kind of  
 7 participation.  
 8 Q. Did LULAC engage in any of those  
 9 advocacy-related activities with regard to Senate Bill  
 10 14 that was enacted during the 2011 legislature?  
 11 A. I believe so. I believe two members of our  
 12 organization actually testified, if my memory serves me  
 13 correctly, during the hearings.  
 14 MR. BARON: Tell him what you recall.  
 15 THE WITNESS: Don't hold me to it, but  
 16 I -- I think we have a few members that actually  
 17 testified in front of the legislature concerning SB14.  
 18 Q. (BY MR. TATUM) And at that time in 2011, you  
 19 were just a member of LULAC. You were not the legal  
 20 adviser. Correct?  
 21 A. Two years back. No.  
 22 Q. Okay.  
 23 A. That's correct. I was not the legal adviser.  
 24 Q. As a member of LULAC during that time, do you  
 25 recall getting any kind of mass communication or e-mail

35

1 you mentioned in the paragraph above kind of deal.  
 2 So this year, for example, there is a  
 3 youth recognition ball in Washington, D.C., from the 2nd  
 4 to the 5th, I think. And during that time, there are  
 5 meeting schedules to meet with legislators, just for us  
 6 to express the opinions -- I mean, to express the issues  
 7 that we have affecting each individual community because  
 8 people -- there's a lot of people that come from every  
 9 state. And, of course, every state gets affected  
 10 differently. So that would be some advocacy program  
 11 that we have kind of deal.  
 12 Q. Okay. And you mentioned those activities on  
 13 the national level. Does LULAC engage in similar  
 14 activities at the state level?  
 15 A. Yes.  
 16 Q. And can you describe some of those  
 17 advocacy-related activities that LULAC has conducted  
 18 specifically in Texas?  
 19 A. We have a legislature chair, like a committee.  
 20 Fidel Acevedo is the name of the chair. And he comes  
 21 here to Capitol Hill and, I guess, try to enlighten the  
 22 legislatures about the positions that LULAC may have,  
 23 depending on what issues are pending or not pending in  
 24 the legislature.  
 25 Q. Uh-huh.

37

1 blast from LULAC regarding SB14-related activities? And  
 2 when I say "SB14," I'm referring to Senate Bill 14  
 3 enacted during the 2011 legislature?  
 4 A. I'm not sure. I know we were -- I know it was  
 5 a lot of talking and a lot of movement within the  
 6 organization, because the organization believed that the  
 7 legislature was not fair to the minorities. So I know  
 8 it was a lot of talking, a lot of public appearances. I  
 9 cannot recall who exactly did it.  
 10 Press conferences, maybe press releases, I  
 11 think some of them came out. I don't -- I don't -- I  
 12 cannot tell you specifics, but I can tell you that,  
 13 during that time, the organization word -- you know,  
 14 SB14 is coming and SB14 -- so it was a pretty, I guess,  
 15 important subject within the organization during that  
 16 time. I recall that, yes.  
 17 Q. Did LULAC as an organization oppose SB14?  
 18 A. I don't think so.  
 19 Q. It did not?  
 20 A. Back then?  
 21 Q. Correct. During --  
 22 A. Well, I wasn't there, so I cannot tell you what  
 23 the people who testify said. If you ask me based on  
 24 what we have today, then the answer to that is no.  
 25 Everybody opposed it, at least within the organization,

38

1 and that's why we involved, so --  
 2 MR. BARON: I think that's what he asked  
 3 you. I think he asked did LULAC oppose it.  
 4 THE WITNESS: Oh, yes. Yes. Yes.  
 5 MR. BARON: I think you just didn't hear  
 6 him correctly.  
 7 Q. (BY MR. TATUM) Let me just -- restate?  
 8 MR. BARON: Because I was --  
 9 THE WITNESS: If you put two noes there,  
 10 then my Spanglish kicks in and --  
 11 Q. (BY MR. TATUM) Understood. Let me just  
 12 restate the question, just for clarity purposes.  
 13 In 2011, did LULAC as an organization  
 14 oppose the enactment of SB14?  
 15 A. My answer -- my answer to that is yes.  
 16 Q. And you testified that to your knowledge some  
 17 members of LULAC provided oral testimony during the  
 18 legislative session?  
 19 A. Yes.  
 20 Q. Voicing their opposition to that bill. Is that  
 21 correct?  
 22 A. That's my understanding.  
 23 Q. Okay.  
 24 A. I don't -- I don't know if what you said is  
 25 correct. That's my understanding.

39

1 Q. Do you know if any members of LULAC met  
 2 personally with members of the Texas legislature during  
 3 the consideration of SB14?  
 4 A. Well, whether personal meetings were conducted  
 5 by certain individuals, I cannot tell you that. You  
 6 know, we have a legislator -- legislature chair who  
 7 comes out on Capitol Hill so -- but I cannot tell you.  
 8 I don't have personal knowledge.  
 9 Q. Do you know if any Texas legislators are  
 10 members of LULAC?  
 11 A. My understanding is yes.  
 12 Q. Do you know who those members are?  
 13 A. I cannot tell you -- I cannot tell you because  
 14 I don't know that -- who is in good standing and who is  
 15 not. I can -- if I tell you who is in good -- it's over  
 16 a hundred thousand members. So I don't -- I can't tell  
 17 you who's in good standing or not today. I did not  
 18 check before this deposition either.  
 19 Q. To the best of your knowledge, were any members  
 20 of LULAC a city member of the Texas legislature in 2011?  
 21 A. I -- I don't have personal knowledge of that.  
 22 Q. Again, during the enactment -- or, sorry.  
 23 During the consideration of SB14 during the 2011  
 24 legislature, did LULAC write or publish any written  
 25 articles or opinion pieces regarding its position on

40

1 SB14?  
 2 A. Whether something came out in the newspaper, is  
 3 that what you mean?  
 4 Q. Yes.  
 5 A. I want to say -- I want to say yes. If my  
 6 memory serves me correctly, I want to say yes. It's  
 7 been three and a half years, so I don't know. Three  
 8 years, so I'm not sure a hundred percent, but I want to  
 9 say yes.  
 10 Q. So would you say that LULAC publicized its  
 11 opposition to SB14?  
 12 A. LULAC will publicize its opposition to anything  
 13 that LULAC believe that is against the well-being or  
 14 benefit or affects any minority. I can tell you that  
 15 for sure.  
 16 Q. And it -- LULAC did that with regard to SB14.  
 17 Correct?  
 18 A. I -- I cannot tell you with certainty. I was  
 19 not involved in 2011. But I can tell you that -- I want  
 20 to say yes to that answer, but I'm not certain.  
 21 Q. Did LULAC draft, propose, research, or request  
 22 any amendments to SB14 while it was being considered in  
 23 2011?  
 24 A. I have no personal knowledge of that.  
 25 Q. Does LULAC believe that it was not given the

41

1 opportunity to adequately voice its opposition to SB14  
 2 in front of the Texas legislature?  
 3 A. I think the word -- again, that would be --  
 4 it's a matter of opinion whether it would be enough.  
 5 Probably not. I don't know. I cannot tell you the  
 6 answer to that question.  
 7 MR. BARON: Yeah. I should have objected  
 8 to that as vague. Just on the basis of the word  
 9 "adequate."  
 10 THE WITNESS: It's a matter of opinion. I  
 11 was like if you give me a day or give me a week, what is  
 12 adequate? I'm not sure.  
 13 Q. (BY MR. TATUM) I'll state it another way. Did  
 14 LULAC have the opportunity to voice its opposition to  
 15 SB14 in front of the Texas legislature?  
 16 A. I'm not sure whether they give them directly  
 17 the opportunity. I'm not sure.  
 18 Q. But you did testify some members of LULAC gave  
 19 live testimony during the --  
 20 A. I believe --  
 21 Q. -- legislative session?  
 22 A. I believe so.  
 23 Q. Okay. Did LULAC as an organization undertake  
 24 any efforts to prevent SB14 from being passed?  
 25 A. What kind of reference?

42

1 Q. Anything that -- did it do anything to slow  
2 down or delay consideration of the bill?  
3 A. I don't know. I don't even think they have the  
4 power to do that.  
5 Q. Is there anything else that LULAC did with  
6 regard -- let me back up.  
7 Are there any other activities that LULAC  
8 engaged in with regard to the consideration of SB14 that  
9 you haven't mentioned?  
10 A. We had a -- sort of like an educational  
11 briefing as to what SB14 is or was. I just cannot  
12 remember the day, but I know I was there. I attended  
13 that, where we got sort of educated on the specific of  
14 the bill and the impact of the bill and what that means  
15 to minorities and that -- so I just cannot tell you  
16 whether it was before or after the bill was passed. I  
17 cannot remember that day. But I remember attending  
18 that.  
19 Q. Okay. Do you remember who presented that  
20 educational presentation?  
21 A. I don't remember who was the presenter. I want  
22 to say that happened in -- I think it was in Corpus  
23 Christi, I think it was. Either Corpus Christi or  
24 Laredo. I'm just not sure. But I know for sure that I  
25 did attend it, to one of those educational briefings

44

1 that you just talked about, how are those funds  
2 allocated?  
3 A. That, I don't have any personal knowledge of  
4 it. We have a national treasurer. And I have no  
5 knowledge of that. Reports are given on the -- on the  
6 meetings, the national board meetings and the  
7 state-level meetings. And I -- I imagine that  
8 district-level meetings and also council meetings, they  
9 all have disclosures that it's mandatory, it's part of  
10 the rules that financial is complete transparency on the  
11 spending of the funds.  
12 I can tell you that the goal of the  
13 organization -- well, not the goal. But education and  
14 civil rights are very strong within the organization.  
15 So scholarships are -- money are used for scholarships.  
16 You see a lot of scholarships out there that the  
17 organization give to young kids for college and other  
18 things. I'm not...  
19 Q. So you mentioned a national treasurer. Is  
20 there a state treasurer?  
21 A. Yes. It's a state -- there's a treasurer on  
22 every level. So there's a treasurer who responds to a  
23 particular board at every level as to the funds.  
24 Q. Okay. So let's take the local level where  
25 there's a -- you know, a local council of LULAC?

43

1 when someone came in and explained everything.  
2 Q. Was that educational briefing put on by LULAC?  
3 A. No. It was put on by someone else who LULAC  
4 invited to do the explanation and educate the Texas  
5 organization as to what it meant.  
6 Q. LULAC is a nonprofit organization. Correct?  
7 A. That's correct.  
8 Q. From where does LULAC receive its funding?  
9 A. Well, you've got membership fees. We've got  
10 very strong corporate alliance. Nationwide. Donations,  
11 sponsorships. That's where the funding comes in.  
12 Q. Do y'all hold fund-raising activities?  
13 A. Yes, but fund-raising activities will be  
14 probably held more -- you see that more typically at the  
15 local levels by the local councils, maybe the district,  
16 you see those fund-raising activities kind of deal.  
17 Q. Uh-huh.  
18 A. It's to cover expenses of functions and then  
19 pay for scholarships, funding for scholarships, things  
20 like that.  
21 Q. Do y'all receive both individual and corporate  
22 donations?  
23 A. Yes.  
24 Q. And the funds generated from membership fees,  
25 donations, sponsorships, and fund-raising, the things

45

1 A. Okay.  
2 Q. Let's say they hold a fundraiser, they raise  
3 some funds. Do they have total control over how those  
4 funds are used?  
5 A. Yes.  
6 Q. And at the state level, if there's ever a  
7 fundraiser held by the state level of LULAC, do they get  
8 to have ultimate control over how those funds are used?  
9 A. Yes.  
10 Q. And do you know if at the state or local  
11 council level, do those entities prepare an annual  
12 budget for the allocation of these funds?  
13 A. There's allocations made. I don't think  
14 there's an official budget, at least on the small  
15 levels. How national -- on the state level, there are  
16 some budgets for the state convention, for specific, I  
17 guess, functions that the organization really wants to  
18 participate every year, and they allocate funds to that,  
19 and those get approved by the board. That's basically  
20 how every level functions, I guess.  
21 Q. Are there any funds that the state board sets  
22 aside to be used on an as-needed basis?  
23 A. Pretty sure. I'm not -- I cannot tell you  
24 what -- if it's one as-needed basis. I don't know. I'm  
25 not sure.

46

1 Q. I want to ask you some -- just a few questions  
 2 about some more activities that LULAC engages in. Does  
 3 LULAC help its members register to vote?  
 4 A. LULAC actually helps everyone registered to  
 5 vote.  
 6 Q. Not just members?  
 7 A. Not just members.  
 8 Q. And is that something that LULAC has always  
 9 done?  
 10 A. Yes. And basically you see that more at the  
 11 council levels. They organize district levels, council  
 12 levels, they do voting registration drives and voting  
 13 registration festivals, whatever it is. They -- the  
 14 kids in college, we have LULAC councils probably in  
 15 every university, at least in Texas, and they -- they  
 16 really active on that. They're very, very active on  
 17 voter registration, and so that -- you see that more at  
 18 the -- it's promoted throughout the organization  
 19 rankings, but the actual people who does it and you'll  
 20 see more active is the actual local councils.  
 21 Q. And does LULAC consider helping people register  
 22 to vote, both members and nonmembers, part of its  
 23 mission?  
 24 A. It's a civil right issue, so I want to say  
 25 it -- it -- it's directly or indirectly. I'm not sure.

47

1 It's a civil rights issue. Voting is a civil right  
 2 issue, and LULAC is involved on anything that encompass  
 3 any civil right issue.  
 4 Q. So would you say that helping people register  
 5 to vote is part of LULAC's stated mission?  
 6 A. Encouraging people to vote and to register,  
 7 yes.  
 8 Q. And helping people -- actually helping someone  
 9 register to vote?  
 10 A. What do you mean, the actual physical  
 11 application, is that what you mean?  
 12 MR. BARON: Objection; form. A little  
 13 vague on the word "helping."  
 14 Q. (BY MR. TATUM) You stated a minute ago that  
 15 one of the activities that LULAC engages in is helping  
 16 people register to vote. I believe that's what you  
 17 testified to. Is that correct?  
 18 MR. BARON: Objection; form.  
 19 THE WITNESS: LULAC conducts voting  
 20 registration drives, voter registration forum, voter  
 21 registration, I guess, activities to encourage people to  
 22 register to vote. And also encourage people to use --  
 23 to actually go and vote. That, LULAC does. That's one  
 24 of LULAC's views as one of the primary civil rights that  
 25 we have. Not just minorities, but everybody.

48

1 And when we do these voter registration  
 2 drives, whether they physically fill out the paperwork  
 3 or not, I -- I don't know. I don't know. Everybody  
 4 will have, I guess, their own individual method,  
 5 depending on who is doing it. So I cannot tell you what  
 6 is actually happening at that place because I'm not  
 7 there, so...  
 8 Q. (BY MR. TATUM) Okay. So would LULAC consider  
 9 these voter registration drives part of its mission?  
 10 A. If it affects civil rights, yes.  
 11 Q. Okay. Does LULAC educate its members regarding  
 12 voting requirements?  
 13 A. I just gave you the example of that. Like this  
 14 luncheon that I went where we got -- LULAC was not the  
 15 one who was educating. We invited someone to help us  
 16 with SB14, for example. Whether we have a plan to  
 17 educate every -- every one of its members, I don't think  
 18 there is a specific educational plan. LULAC national  
 19 encourage down -- down the -- the chain of command to  
 20 ensure that we get as many people registered, and to  
 21 ensure that we get as many people to go and vote.  
 22 Q. Outside of the educational briefing that you  
 23 just referenced, has LULAC conducted any other  
 24 activities that educate its members regarding voting  
 25 requirements?

49

1 A. At the -- at the -- at what level?  
 2 Q. At the state or local council level.  
 3 A. At the -- at the local council, I cannot tell  
 4 you. There -- there -- a lot. I mean, there's -- I  
 5 think there's like a thousand councils or a little more  
 6 than a thousand councils, I think. So it's a lot. I  
 7 don't know. State-wise, when I attended to that  
 8 luncheon, it was a state -- it was a state board  
 9 meeting, and this guy came and educate the whole board  
 10 as to what -- and I'm pretty sure, I guess, pass along  
 11 the state director or the district directors -- I'm  
 12 pretty sure they go and educate the council members as  
 13 to what they learn and use that kind of scaling to pass  
 14 the word around.  
 15 Q. Okay. Is educating its members regarding voter  
 16 requirements part of the stated mission of LULAC?  
 17 A. I'm sure it's included. It's not the stated  
 18 mission. We don't have a stated mission as to a  
 19 compromise with anyone to register people to vote. I  
 20 don't think that's the mission. I think the mission is  
 21 to ensure that -- that civil rights of the minorities  
 22 are protected. Whether that is through vote, through  
 23 pending legislature or supporting legislature, or  
 24 advocating in the public, whatever that views are, I  
 25 don't think it's a specific issue on -- it's not a



50

1 specific mission of educating people as to voting.  
 2 Now, I can tell you that if there is  
 3 something comes out that affects minorities, then LULAC  
 4 is going to ensure that people understand what the  
 5 problems are, because they need to be, I guess, informed  
 6 of what -- what it is.

7 Q. Let me ask it another way. Does LULAC believe  
 8 that it is fulfilling its mission when it educates its  
 9 members on voting requirements?

10 MR. BARON: Objection; form.

11 THE WITNESS: I cannot answer that.

12 Q. (BY MR. TATUM) Does LULAC at the state or  
 13 local council level help its members get the  
 14 documentation or IDs necessary to vote under SB14?

15 A. At what level?

16 Q. At the state or local council level.

17 A. What the little -- what the councils do, I -- I  
 18 cannot tell you at all, because I don't have any  
 19 personal knowledge as to -- it's about 400 just in the  
 20 State of Texas, so I don't know what they do  
 21 individually. What -- what steps they take is up to  
 22 them, and there's no reporting up of what is taken  
 23 either. So there's no like -- I can sit down and read  
 24 what local council No. 1 out of Corpus Christi have done  
 25 regarding anything, so -- because it's just not

52

1 MR. BARON: Objection; form.

2 THE WITNESS: I don't know what constitute  
 3 political influence. There are many ways of political  
 4 influence. So I -- at a specific event that is  
 5 categorized as a political influence, I don't know. I  
 6 couldn't tell you.

7 Q. (BY MR. TATUM) Does LULAC assist voters during  
 8 elections?

9 A. How?

10 Q. Do they give rides to the polling places?

11 A. Not that I'm aware of.

12 MR. BARON: Object; form. Anyway -- I  
 13 mean, I'm not trying to be argumentative here, Steve,  
 14 but I -- when you're asking questions like that about  
 15 logistics and things of that nature, it would be  
 16 helpful, I think, if you would distinguish between the  
 17 Texas organization that he's here on behalf of, or if  
 18 you want to know what -- I think he's already told you  
 19 that he doesn't know what the various individual  
 20 councils might do.

21 MR. TATUM: Okay.

22 MR. BARON: So you can either ask both  
 23 questions or something, you know, but I -- I mean, I  
 24 think the point -- and I'm not trying to mess the record  
 25 up. But I think his point would be that the state

51

1 required.

2 Q. Is advancing the political influence of the  
 3 Hispanic population of the United States part of LULAC's  
 4 stated mission?

5 A. Say that again.

6 Q. I'm just reading from the Web site here. Is  
 7 advancing the political influence of the Hispanic  
 8 population of the United States part of LULAC's stated  
 9 mission?

10 A. Where are you reading from?

11 Q. On the first page of Exhibit 4, under  
 12 Paragraph 2, it states, "What is LULAC's mission," and  
 13 one of those things listed there is "political  
 14 influence." So I'm asking --

15 A. Yes.

16 Q. -- is the advancement of the political  
 17 influence of the Hispanic population of the United  
 18 States part of LULAC's stated mission?

19 A. Yes. It's right there.

20 Q. Okay. So would helping people to vote, by way  
 21 of educating them on voting requirements or helping them  
 22 get the documentation necessary to vote, would that  
 23 be -- would that constitute the advancing the political  
 24 influence of the Hispanic population of the United  
 25 States?

53

1 organization doesn't do any of that.

2 THE WITNESS: We state do not participate  
 3 on transporting anybody anywhere for any reason, no  
 4 matter what the situation is.

5 Q. (BY MR. TATUM) But locally the councils may?

6 A. Maybe -- maybe a little council helps his own  
 7 family members or friends or encourage voting and -- but  
 8 I cannot tell you what activities.

9 Q. Okay. How are we doing on time? Do we need to  
 10 take a break, or is everyone doing all right?

11 MR. BARON: I'm fine. It's up to him.

12 THE WITNESS: I need to make a two-second  
 13 phone call.

14 MR. BARON: Why don't we take a little  
 15 five-minute break. It's five minutes after 5:00.

16 (Off the record)

17 Q. (BY MR. TATUM) Mr. Ortiz, is LULAC as an  
 18 organization harmed by SB14?

19 MR. BARON: Objection; form.

20 THE WITNESS: I cannot tell you. I don't  
 21 think I -- I have -- I don't think I can answer that,  
 22 because LULAC doesn't vote, so I don't know -- don't try  
 23 to be sarcastic, but I just do not know what you mean by  
 24 "harm." That's what I'm saying.

25 Q. (BY MR. TATUM) Does LULAC contend that the



54

1 implementation of SB14 has forced LULAC to divert any of  
2 its resources towards certain activities -- resources  
3 that could have been spent elsewhere?

4 A. Divert LULAC to this lawsuit, so...

5 Q. Other than this lawsuit, has LULAC been forced  
6 to divert any of its resources specifically to  
7 SB14-related activities?

8 A. At what level?

9 Q. At the state level.

10 A. I cannot answer that. I don't know what the  
11 arrangement is.

12 Q. Do you know -- do you know if any LULAC local  
13 councils have had to divert any of its resources towards  
14 SB14-related activities?

15 A. I don't have personal knowledge of that.

16 Q. Does LULAC contend that SB14 was enacted with a  
17 discriminatory purpose?

18 A. Can you -- can you repeat it?

19 Q. Sure. Does LULAC contend that SB14 was enacted  
20 with a discriminatory purpose?

21 MR. BARON: Object to form. Legal  
22 conclusion.

23 THE WITNESS: LULAC is contending what is  
24 on the pleadings. I don't think I have the -- what the  
25 contentions are. LULAC is contending exactly what is on

56

1 MR. BARON: I'm going to object. I'm  
2 going to object on the basis that he's here as a  
3 30(b)(6) witness, not as a expert witness on the effects  
4 of SB14.

5 Subject to that objection, if you have a  
6 response, you can make it.

7 THE WITNESS: I don't -- I don't think I  
8 have any -- I don't know. I don't think I can give you  
9 any answer as to -- do you want me to tell you what --  
10 whether Texas has a notorious history of  
11 disenfranchising voters? Is that what you want me to  
12 tell you?

13 Q. (BY MR. TATUM) Do you believe that to be true?

14 A. I believe it's true.

15 Q. And can you tell me what that belief is based  
16 on?

17 A. Well, we have a long history of case law.

18 MR. BARON: And, again, I'm going to  
19 object just to the extent that this seems to be outside  
20 the scope of what a 30(b)(6) deposition is for.

21 MR. TATUM: Well, it's -- and I would  
22 respond that this is a allegation made in the complaint,  
23 and the notice of this deposition specifically has a  
24 topic that relates to the allegations made in the  
25 complaint.

55

1 the pleadings. Right now, I cannot deviate from that  
2 because it's what is on the pleadings. I mean, unless  
3 you want to ask me a different way, but --

4 Q. (BY MR. TATUM) Well, sure. I'll ask you --

5 A. The only thing I can contend is what is on the  
6 pleadings.

7 Q. Okay. Well, let's look at the pleadings. I  
8 believe the complaint is Exhibit --

9 A. Three.

10 Q. -- 3. Do you have it in front of you?

11 A. Yes, sir.

12 Q. On the first page of that complaint, I'm

13 looking at the first paragraph which states that "The  
14 State of Texas has a long notorious history of  
15 disenfranchising voters by various methods and  
16 discriminating against classes of voters, especially on  
17 account of race and ethnicity. Senate Bill 14 of 2011  
18 is another effort to achieve those unlawful ends." Do  
19 you see those sentences?

20 A. Yes, sir.

21 Q. Did I read them accurately?

22 A. That's what it says in the pleadings.

23 Q. Can you tell me how Senate Bill 14  
24 disenfranchises voters?

25 A. Specifically --

57

1 MR. BARON: Absolutely. I understand.  
2 And, of course, I've objected to that particular  
3 category. But, again, subject to the objection that --  
4 the objection is I think it's, you know, outside the  
5 scope of 30(b)(6). I also --

6 THE WITNESS: I think that's --

7 MR. BARON: Just for the record, the  
8 witness is being presented here as a 30(b)(6) deponent  
9 on behalf of LULAC and not as an expert witness. And  
10 subject to that objection, feel free to answer.

11 THE WITNESS: I think -- I think that's  
12 your question No. 1. That's your point No. 1 on the  
13 depo that I told you that I really -- I don't have  
14 any -- at the beginning specifically said that we don't  
15 have any opinion or personal knowledge in my hands to  
16 provide you -- I don't have any information in my hands  
17 to provide you answers to that request that you have for  
18 No. 1.

19 Q. (BY MR. TATUM) Okay. So just for the record,  
20 with regard to matter No. 1, you are unable to give  
21 testimony regarding the factual basis of LULAC's claims  
22 or defenses in this lawsuit?

23 A. Other than what is on the pleadings, you know,  
24 that's what -- at least what is on the pleadings, that's  
25 our factual basis and claims in this case. I don't

58

1 think we have any defenses. In my -- I mean, I cannot  
 2 tell you that. You've got to...  
 3 Q. But you've been designated by LULAC to testify  
 4 on its behalf today. Correct?  
 5 A. Under the 30(b)(6). Yes.  
 6 Q. Okay. Does LULAC contend that SB14 was enacted  
 7 with discriminatory intent?  
 8 A. If I go by the pleadings, the answer to your  
 9 question is yes.  
 10 Q. And do you know on what basis LULAC makes that  
 11 claim?  
 12 A. Again, I think that will be experts. I mean, I  
 13 don't -- I don't have any --  
 14 MR. BARON: Same objection. Object to the  
 15 last question as being outside the scope of 30(b)(6).  
 16 THE WITNESS: Do you want -- I'll be  
 17 honest with you. I --  
 18 MR. BARON: Calls for a legal conclusion.  
 19 Q. (BY MR. TATUM) Would you -- in answer to that  
 20 question, would you just -- are you saying that you  
 21 would defer to what's written in the pleadings?  
 22 A. I would defer from the pleadings and the file,  
 23 the records, exhibits, experts.  
 24 Q. Okay. So sitting here today, you're unable to  
 25 tell me what LULAC believes is discriminatory about

60

1 additional ID imposed by SB14, aside from the voter  
 2 registration card is -- affects Hispanics and is  
 3 targeted and is designed to affect the Hispanic  
 4 population in the state of Texas.  
 5 Q. Are you familiar with the requirements of SB14?  
 6 A. Of the IDs that they need?  
 7 Q. Yes.  
 8 A. I'm -- I'm generally familiar what they need.  
 9 Q. Can you tell me what IDs are required under  
 10 SB14?  
 11 MR. BARON: I'm going to register the same  
 12 objection. I mean, seriously, these kind of fact-based  
 13 questions seem to be now way outside the scope of a  
 14 30(b)(6) deposition. And, certainly, I don't understand  
 15 the relevance of this witness's personal knowledge about  
 16 the requirements of SB14. And, of course -- of course  
 17 there's -- I think there's something like 17 expert  
 18 reports that have been provided and countless documents  
 19 and other testimony that all would seem to be a better  
 20 source of information for the answers to these questions  
 21 than Mr. -- than our 30(b)(6) designee here.  
 22 Subject to that objection, tell him what  
 23 you know about Senate Bill 14.  
 24 THE WITNESS: The ID requirements?  
 25 Q. (BY MR. TATUM) Yes.

59

1 SB14. Is that correct?  
 2 MR. BARON: Same objection. Of course, I  
 3 think this question is now repetitious, but it does seem  
 4 to be outside the scope of a 30(b)(6) deposition. And  
 5 calls for legal conclusions.  
 6 And subject to that objection, you can go  
 7 ahead and answer and --  
 8 THE WITNESS: If I read the pleadings,  
 9 LULAC believes that the requirement of -- the additional  
 10 requirement of an ID, aside from the voter registration  
 11 card, is a discriminatory against Hispanics. That's  
 12 what LULAC believes.  
 13 Q. (BY MR. TATUM) And did you read that from the  
 14 pleading?  
 15 A. No. I'm not reading from any specific portion.  
 16 I'm telling you my short answer from the pleadings, or  
 17 from what I know.  
 18 Q. And that belief that you just described, can  
 19 you tell me why LULAC believes that?  
 20 A. What did LULAC believe as an organization that  
 21 is discriminatory?  
 22 Q. Yes.  
 23 A. I don't -- I don't know. I'm -- I'm baffled by  
 24 the word "belief," because they believe that it's  
 25 discriminatory, the requirement of asking for an

61

1 A. There needs to be either a DPS issue, military  
 2 ID. Current, nonexpired.  
 3 THE REPORTER: Current --  
 4 THE WITNESS: Non --  
 5 THE REPORTER: NonHispanic.  
 6 MR. BARON: Oh, no. No. No.  
 7 THE WITNESS: Nonexpired.  
 8 THE REPORTER: Nonexpired.  
 9 THE WITNESS: Military or any ID, it needs  
 10 to be current. I mean, it's right here on Page 9, so --  
 11 US government employee, which is military ID, Texas  
 12 concealed weapons permit, US passport, and a election  
 13 identification certificate.  
 14 Q. (BY MR. TATUM) What's commonly known as an  
 15 EIC?  
 16 A. Yeah.  
 17 Q. Mr. Ortiz, are you -- do you agree that the  
 18 requirements of SB14 apply equally to all Texas citizens  
 19 regardless of race?  
 20 A. I don't know --  
 21 MR. BARON: Same objection -- hold on a  
 22 second.  
 23 Do you have the objection? Same -- I  
 24 mean, if I say -- I mean, do I need to state it every  
 25 single time now?

62

1 THE REPORTER: If you same "same  
2 objection," I'm going to type "same objection." So  
3 unless you -- I mean, then you could go up and refer,  
4 but I just take down what you say.  
5 MR. BARON: In the interest of moving this  
6 along, you'll agree that it's the same objection that I  
7 made to the previous question?  
8 MR. TATUM: Yes.  
9 MR. BARON: Okay. And then if it changes,  
10 I'll restate it differently. Same objection as to the  
11 previous question.  
12 Thank you. I appreciate that, Stephen.  
13 MR. TATUM: Sure.  
14 THE WITNESS: What was the question again?  
15 Q. (BY MR. TATUM) Would you agree that the  
16 requirements of SB14 apply equally to all citizens  
17 regardless of race?  
18 A. The application of the law is made by  
19 individuals, so I cannot -- I cannot answer that  
20 question. How it's applied, that would be the people  
21 who is applying it, so...  
22 Q. Is there anything in the text of SB14 that  
23 makes it applicable only to one race of people?  
24 A. I don't know the whole language of the statute.  
25 I have read it briefly, but I don't -- I have not read

63

1 the whole statute, so I cannot answer that question.  
2 Q. Does LULAC contend that the Texas legislature  
3 intended to harm any minority group by enacting SB14?  
4 A. Texas legislature as a whole?  
5 Q. Yes.  
6 A. Or the people who voted in favor?  
7 Q. Let's start with the people who voted in favor  
8 of SB14.  
9 A. So repeat your question again.  
10 Q. Does LULAC contend that the Texas legislators  
11 who voted for SB14 intended to harm any minority group?  
12 A. I don't know what they intend or how each  
13 individual person was acting. You know, the intent of  
14 the legislature, I don't know what they intended  
15 individually, so I don't know.  
16 Q. Does LULAC contend that any of its members lack  
17 any of the acceptable forms of ID under SB14?  
18 A. Are you talking about any of the hundred  
19 thousand people?  
20 Q. Yes. And let me just ask first, when you say  
21 100,000 members, are there 100,000 members of the  
22 national LULAC, or are there 100,000 members of the  
23 Texas LULAC?  
24 A. No. The national is composed of about a  
25 hundred thousand.

64

1 Q. Okay. And do you know how many of those  
2 hundred thousand members are Texas residents?  
3 A. I cannot tell you an exact number. I can tell  
4 you that we are the biggest -- but if you divide the  
5 organization by state, then Texas is the biggest  
6 membership.  
7 Q. Can you put a percentage on that?  
8 A. I don't know. I cannot tell you. Maybe  
9 30 percent, 40 percent.  
10 Q. But Texas has -- amongst all the states, Texas  
11 has the largest percentage of LULAC members?  
12 A. Yes.  
13 Q. Okay. Does LULAC contend that any of its  
14 members who reside in Texas lack any of the acceptable  
15 forms under -- of ID under SB14?  
16 A. I have no personal knowledge of whether those  
17 members do or don't.  
18 Q. Are you able to identify one member of LULAC  
19 that does not have any of the acceptable forms of ID  
20 under SB14?  
21 A. I have -- I have no personal knowledge of  
22 whether they -- if they have, I have no personal  
23 knowledge.  
24 Q. Okay. Do you know how many members of LULAC do  
25 not have any of the documents necessary to get an EIC?

65

1 A. I don't have any personal knowledge about it.  
2 Q. Are you able to identify any members of LULAC  
3 who do not have any of the documents necessary to get an  
4 EIC?  
5 A. When you said "able," can you explain that?  
6 Now? Later? Yesterday?  
7 Q. Currently. Are you currently able to identify  
8 any member of LULAC who does not have the ability or  
9 does not have any of the documents necessary in order to  
10 obtain an EIC?  
11 A. I cannot answer that question.  
12 Q. Do you know if any -- any members of LULAC have  
13 attempted to get an EIC?  
14 A. I have no personal knowledge whether they have  
15 or not.  
16 MR. BARON: Let's go off the record.  
17 THE REPORTER: Is that okay to go off?  
18 MR. TATUM: Yeah. Yeah. That's fine.  
19 (Off the record)  
20 Q. (BY MR. TATUM) Mr. Ortiz, can you identify any  
21 member of LULAC who has attempted to get an NI -- who  
22 has attempted to get an EIC?  
23 A. Can you give me time frames on that?  
24 Q. Ever.  
25 A. Then, I don't know.

66

1 Q. Is LULAC able to specify a specific instance in  
 2 which a LULAC member attempted to obtain an acceptable  
 3 form of ID under SB14 but was unable to?  
 4 A. I can't answer that.  
 5 MR. BARON: Object; form.  
 6 Q. (BY MR. TATUM) Does LULAC contend that SB14  
 7 makes it impossible for anyone to vote?  
 8 MR. BARON: Objection; form --  
 9 THE WITNESS: Contend --  
 10 MR. BARON: -- to the use of the word  
 11 "impossible."  
 12 THE WITNESS: LULAC contends that  
 13 legislation intended to affect voting rights of the  
 14 Hispanic community and the minorities by enacting State  
 15 Bill 14.  
 16 MR. BARON: Senate Bill 14.  
 17 THE WITNESS: Yeah. I mean -- sorry.  
 18 Senate Bill.  
 19 (Laughter)  
 20 Q. (BY MR. TATUM) Can you tell me what that  
 21 contention is based on?  
 22 A. Based on the requirement that the Senate  
 23 Bill 14 asks for an additional identification other than  
 24 the voter registration card to be able to vote.  
 25 Q. And does LULAC agree that that requirement

68

1 result of the implementation of SB14?  
 2 MR. BARON: Object; form.  
 3 THE WITNESS: I don't have any personal  
 4 knowledge of that.  
 5 Q. (BY MR. TATUM) Can you identify any LULAC  
 6 member who as of December 6th, 2013, had been injured --  
 7 had been harmed in any way as a result of the  
 8 implementation of SB14?  
 9 MR. BARON: Object; form, vague.  
 10 THE WITNESS: I don't have -- I can't -- I  
 11 don't have any personal knowledge.  
 12 Q. (BY MR. TATUM) Can you identify any LULAC  
 13 member who as of today's date has or may be harmed in  
 14 any way by the implementation of SB14?  
 15 A. What do you mean?  
 16 MR. BARON: Object to form; vague.  
 17 THE WITNESS: Can you -- can you --  
 18 Q. (BY MR. TATUM) I'll break that into two  
 19 questions, how about that.  
 20 Can you identify any LULAC member who as  
 21 of today's date has been harmed in any way by the  
 22 implementation of SB14?  
 23 MR. BARON: Objection; form.  
 24 THE WITNESS: I have no personal  
 25 information.

67

1 applies to all Texas registered voters?  
 2 A. I don't know what the application of the law  
 3 is. So I cannot answer that.  
 4 Q. Can you identify any LULAC members who have not  
 5 been able to vote in an election because of SB14?  
 6 A. I can't -- I don't have personal knowledge of  
 7 that.  
 8 Q. Do you know if any LULAC members have chosen  
 9 not to vote in an election because of SB14?  
 10 A. I don't -- I don't have personal knowledge of  
 11 that.  
 12 Q. Can you identify a member of LULAC who as of  
 13 June 26th, 2013, had been injured as a result of the  
 14 implementation of SB14?  
 15 MR. BARON: Objection; form.  
 16 THE WITNESS: What do you mean by injury?  
 17 MR. BARON: Form, "injured."  
 18 Q. (BY MR. TATUM) Let me restate it. Can you  
 19 identify a LULAC member who as of June 26th, 2013, had  
 20 been harmed in any way as a result of the implementation  
 21 of SB14?  
 22 A. I don't have personal knowledge of that, so I  
 23 can't answer that question.  
 24 Q. Can you identify a member of LULAC who as of  
 25 August 22nd, 2013, had been harmed in any way as a

69

1 MR. BARON: Vague.  
 2 THE WITNESS: I have no personal knowledge  
 3 of that.  
 4 Q. (BY MR. TATUM) Can LULAC currently identify a  
 5 single member of its organization who has been or may be  
 6 injured as a result of the implementation of SB14?  
 7 MR. BARON: Object; form, vague.  
 8 THE WITNESS: LULAC doesn't keep or  
 9 maintain records specifically specifying none of these  
 10 questions you asked me. We don't maintain records of  
 11 that. There is not a requirement to maintain records of  
 12 that, or there's no way for me to know that because the  
 13 membership is so big, that if someone is affected, then  
 14 I don't -- I don't have any personal knowledge of that.  
 15 Q. (BY MR. TATUM) So would you say that LULAC  
 16 does not have sufficient membership information to allow  
 17 it to identify a member that does not possess an SB14  
 18 identification?  
 19 A. What is SB14 identification?  
 20 Q. Any form of ID that's required to vote under  
 21 SB14.  
 22 A. Can you repeat it again?  
 23 Q. Sure. Would you say that LULAC does not have  
 24 sufficient membership information to allow it to  
 25 identify a member of LULAC who does not have an

70

1 acceptable form of ID under SB14?  
 2 A. I don't understand your question.  
 3 Q. We talked about the forms of ID that are  
 4 required under SB14 previously --  
 5 A. Right.  
 6 Q. -- and I believe you identified the types of ID  
 7 that are required to vote under SB14.  
 8 A. Right.  
 9 Q. Do you recall that testimony?  
 10 A. That is they are required by SB14 in order to  
 11 be able to vote?  
 12 Q. Yes.  
 13 A. Yes.  
 14 Q. Are you familiar with those IDs that SB14  
 15 requires in order to votes?  
 16 A. I'm not -- I'm not familiar. I've never seen  
 17 what -- I've never seen the election identification  
 18 certificate. I've never seen one of those. So I don't  
 19 know what it requires for me to obtain one of those or  
 20 how it looked like. I mean, I know what a driver's  
 21 license is, and I know a military because I have one, or  
 22 I had one, and I know what a passport is because I have  
 23 one. But I don't know election identification  
 24 certificate is. Never seen it. Do not know.  
 25 MR. TATUM: Do you know where we are?

72

1 Q. Can you read the language below that, beginning  
 2 with "Texas voters must show..."  
 3 A. "Texas voters must show photo ID to vote in  
 4 elections in Texas unless you are exempt. See  
 5 exemptions below."  
 6 Q. Will you read the next paragraph, please?  
 7 A. (As read), "If you do not have any of the  
 8 following acceptable forms of ID, beginning June 26,  
 9 2013, you may apply for an election identification  
 10 certificate at no charge. However, if you already have  
 11 any of the following forms of ID, you are not eligible  
 12 for EIC." Do you want me to read the whole thing?  
 13 Q. Not yet. I'm going to stop you there.  
 14 Mr. Ortiz, I represent to you that the forms of ID that  
 15 are listed below here are all acceptable forms of ID  
 16 under SB14, and I represent to you that pursuant to what  
 17 you just read, if you have any of these forms of ID, you  
 18 are not eligible to receive an EIC. But if you don't  
 19 have any of these forms of ID, you are.  
 20 Do you have any reason to believe that  
 21 what I've told you or what's contained on this page is  
 22 inaccurate?  
 23 A. I mean, it says it there, so I don't know what  
 24 accuracy of the document is, but --  
 25 Q. Okay.

71

1 THE REPORTER: I think 5 is the next one.  
 2 MR. TATUM: Five is the next one?  
 3 THE REPORTER: Yeah. You don't have a  
 4 No. 5 there, do you?  
 5 THE WITNESS: No. No.  
 6 MR. TATUM: I think you're right. I think  
 7 it's 5.  
 8 THE REPORTER: Okay.  
 9 MR. TATUM: I've got a 4 is the last one  
 10 I've got.  
 11 (Exhibit No. 5 marked)  
 12 Q. (BY MR. TATUM) Okay. Mr. Ortiz, I am handing  
 13 you what's been marked as Exhibit 5. Mr. Ortiz, I  
 14 represent to you that this is a print off or a screen  
 15 capture printout from the Web site of the Texas  
 16 Department of Public Safety. I printed this off on  
 17 July 30th of this year.  
 18 Can you tell me what it says there at the  
 19 top of this page in bold letters?  
 20 A. I'm assuming you're referring to the title, not  
 21 to the "Texas Department of Public Safety." Right?  
 22 Q. Yes. Below that.  
 23 A. "Election Identification Certificate."  
 24 Q. Okay.  
 25 A. EIC.

73

1 A. -- I have no reason to dispute it either.  
 2 Q. Okay. Will you read for me, please, the forms  
 3 of ID that are listed in those bulleted points there on  
 4 Page 1?  
 5 MR. BARON: I'm going to object to this  
 6 line of questioning. I mean, the document, first of  
 7 all, speaks for itself. I don't know why we need to  
 8 waste time having him read them. And, second of all,  
 9 how is this relevant at all to his being here as a  
 10 representative of LULAC pursuant to a 30(b)(6)? If you  
 11 have some questions that are related to that --  
 12 MR. TATUM: Well, these are relevant  
 13 because these are the forms of ID that are required  
 14 under SB14, the law that's the subject of this lawsuit.  
 15 LULAC is part of a group that's suing the State because  
 16 of this law. He's here to represent the beliefs and  
 17 contentions of LULAC. I'm trying to establish whether  
 18 or not he understands what SB14 requires. And these are  
 19 setup questions that are leading to my next question  
 20 regarding its membership.  
 21 MR. BARON: Well, let's ask the membership  
 22 question, then.  
 23 MR. TATUM: Well, I tried, and he said he  
 24 didn't understand what I meant by forms of ID under  
 25 SB14. So I'm trying to clear that up.



74

1 MR. BARON: Okay. We've shown him. He's  
2 got them in front of him.  
3 MR. TATUM: For the record, I would  
4 just --  
5 THE WITNESS: I said that I don't know  
6 what a EIC is.  
7 Q. (BY MR. TATUM) Correct. And you've also --  
8 A. I've not seen one.  
9 Q. Okay. And you've also stated that you weren't  
10 sure what I meant by forms of ID under SB14, and I  
11 represent to you that the forms of ID listed here on  
12 this page are the forms of ID that are required to vote  
13 under SB14, in addition to an EIC.  
14 A. Okay.  
15 Q. So based on what's on this page, would you  
16 agree that the acceptable forms of ID under SB14 are a  
17 Texas driver's license, a Texas personal ID card, a  
18 Texas concealed handgun license, a US passport book or  
19 card, a US military identification with photo, a US  
20 citizenship certificate or certificate of naturalization  
21 with photo and an EIC.  
22 A. Okay.  
23 Q. Okay. So having established what the required  
24 forms of ID are under SB14, is it your testimony that  
25 LULAC does not have sufficient membership information to

76

1 they can or cannot.  
2 Q. And can you not tell me whether they can or  
3 cannot -- is the reason you can't tell me because LULAC  
4 does not have sufficient membership information to allow  
5 it to identify a member that does not possess an SB14  
6 ID?  
7 A. Well, when -- when LULAC members filed the  
8 application for membership, there is not a specific  
9 question whether they have any form of ID. So what is  
10 going to allow them to identify it in the future would  
11 rely on the lawyers and experts and the team that are  
12 representing LULAC in this to do that. If that answers  
13 your question. I'm not sure.  
14 Q. Does LULAC maintain a list of its membership?  
15 A. I believe so. Yes.  
16 Q. And from that list is LULAC able to determine  
17 if any of its members have an acceptable form of ID as  
18 required by SB14?  
19 A. There is not a specific field on the  
20 application for that particular -- so the answer to that  
21 would be no, if I look at the membership list.  
22 Q. Okay. So then would you agree that LULAC does  
23 not maintain sufficient membership information to allow  
24 it to determine whether or not a LULAC member has a  
25 acceptable form of ID under SB14?

75

1 allow it to identify a member that does not possess an  
2 SB14 identification?  
3 A. No.  
4 Q. That is not your testimony?  
5 A. No.  
6 Q. So is LULAC able to identify a LULAC member  
7 that does not possess an acceptable form of ID under  
8 SB14?  
9 A. What you asked me before was not what you asked  
10 me now. You asked me whether LULAC can at some point  
11 identify -- that it cannot at some point identify -- we  
12 can go back on the record and read it, but the way you  
13 asked me before, the answer to that is no.  
14 Q. Okay. I'm going to start over because now I'm  
15 confused.  
16 A. You can read it from the record.  
17 Q. We can if we want, but let's just start over.  
18 A. Okay. Go.  
19 Q. Can LULAC identify a member of LULAC who does  
20 not possess an acceptable form of ID under SB14?  
21 A. What period? Past, present, or future?  
22 Q. As we sit here.  
23 A. Okay.  
24 Q. Currently.  
25 A. Okay. I don't know. I cannot tell you whether

77

1 A. I don't have any personal knowledge of that.  
2 The only thing I can tell you is what is required for  
3 membership. We don't ask for ID.  
4 Q. On June 26, 2013, could LULAC identify a member  
5 of its organization that did not possess an acceptable  
6 form of ID under SB14?  
7 A. I don't have any personal knowledge of that.  
8 Q. On August 22nd, 2013, could LULAC identify a  
9 single member of its organization that did not possess  
10 an acceptable form of ID under SB14?  
11 A. I don't have any personal knowledge.  
12 Q. On December 6, 2013, could LULAC identify a  
13 single member of its organization that did not possess  
14 an acceptable form of ID under SB14?  
15 A. I have no personal knowledge of that.  
16 Q. As of today's date, August 14, 2014, can LULAC  
17 identify a single member of its organization who did not  
18 possess an acceptable form of ID under SB14?  
19 A. I have no personal knowledge of that.  
20 Q. As of today's date, August 14th, 2014, can  
21 LULAC identify any member of its organization who has  
22 suffered harm at any point in any way because of SB14?  
23 MR. BARON: Object; form, vague,  
24 overbroad.  
25 THE WITNESS: What -- I don't define what



78

1 "harm" is, so I -- I can't answer that question. I  
 2 don't have personal knowledge as to any harm.  
 3 Q. (BY MR. TATUM) Does LULAC support the idea  
 4 that only registered voters should be allowed to vote?  
 5 A. We have never discussed that particular  
 6 question, so I -- I don't know.  
 7 Q. LULAC does not have a position on that issue?  
 8 MR. BARON: Objection; form.  
 9 THE WITNESS: I don't know.  
 10 MR. BARON: That misstates his testimony.  
 11 THE WITNESS: I mean, I have never been in  
 12 the presence of the discussion of that particular  
 13 subject, so I don't have any knowledge of that.  
 14 Q. (BY MR. TATUM) Does LULAC believe that Texas  
 15 should make sure that people attempting to vote are  
 16 registered voters?  
 17 A. Repeat that again.  
 18 Q. Does LULAC believe that Texas should make sure  
 19 that people attempting to vote are registered voters?  
 20 A. I don't know what Texas should make sure --  
 21 what Texas -- I don't know what Texas should do or not  
 22 do. If you are eligible to vote, you should vote. So  
 23 that's the opinion of LULAC.  
 24 Q. Does LULAC believe that a person should not  
 25 vote or attempt to vote in the name of someone else?

79

1 A. Does LULAC believe -- say that again.  
 2 Q. Sure. Does LULAC believe that a person -- a  
 3 person should not vote or attempt to vote in the name of  
 4 someone else?  
 5 A. LULAC believes one person, one vote. And if  
 6 you are eligible to vote, you should be able to vote.  
 7 Q. And does LULAC believe that Texas should make  
 8 sure that a person who is attempting to vote is who they  
 9 say they are?  
 10 A. I don't know. I cannot answer that question.  
 11 Q. Does LULAC acknowledge that voter fraud exists?  
 12 A. We have never discussed -- I have never  
 13 discussed it with anyone, so I cannot tell you the  
 14 answer to that particular question.  
 15 Whether -- whether it exists or not, I --  
 16 I personally do not know, so...  
 17 Q. Do you believe that voter fraud exists?  
 18 A. Me personally?  
 19 Q. Sure.  
 20 A. I believe that it happened before, based on  
 21 what I read, case law and things like that.  
 22 Q. Do you believe that voter fraud should be  
 23 illegal?  
 24 A. I think it's illegal.  
 25 Q. Do you believe it should be?

80

1 A. Fraud -- any -- any fraud should be illegal,  
 2 not just voter fraud. Any fraud.  
 3 Q. Do you believe that requiring someone to prove  
 4 who they are when they're attempting to vote deters  
 5 voter fraud?  
 6 MR. BARON: Object to form.  
 7 THE WITNESS: I don't have the expertise  
 8 to tell you what -- what deterrence could be in place or  
 9 not. I really cannot answer that.  
 10 Q. (BY MR. TATUM) Do you know if any member of  
 11 LULAC has ever communicated any allegation or concern to  
 12 LULAC relating to voter fraud?  
 13 A. I don't have any personal knowledge of -- of  
 14 that. I mean, it's the levels. You know, it's -- it  
 15 happened in the lower level. I have no personal  
 16 knowledge of that.  
 17 Q. Do you know if LULAC has ever conducted any  
 18 kind of calculation or report or analysis relating to  
 19 voter fraud?  
 20 A. I think you will have to ask that to the  
 21 lawyers who have accumulated all the experts, graphics,  
 22 I guess.  
 23 Q. Okay. I'm just asking --  
 24 A. Statistics, things like that that they have. I  
 25 don't --

81

1 Q. To your knowledge, has LULAC ever conducted any  
 2 kind of study, analysis, or report in relation to voter  
 3 fraud?  
 4 A. You're talking about paid and sponsored by  
 5 LULAC?  
 6 Q. Have they conducted one themselves?  
 7 A. I don't know. I really don't know.  
 8 Q. Have they ever paid someone else to conduct  
 9 such a study for them?  
 10 A. I don't think that -- you're going to have  
 11 to -- whomever is paying the experts on this case. I  
 12 don't know.  
 13 Q. I'm asking you. I'm not --  
 14 MR. BARON: Independent of this lawsuit, I  
 15 guess, is what he's asking. Other than what may have  
 16 been done by your attorneys.  
 17 THE WITNESS: No, not that I know.  
 18 Q. (BY MR. TATUM) Okay. Do you know if any  
 19 member of LULAC has ever expressed support for voter ID  
 20 laws?  
 21 A. Which particular law?  
 22 Q. Any law relating to voter identification  
 23 requirements.  
 24 A. In general terms like that --  
 25 MR. BARON: Objection; form.

82

1 THE WITNESS: -- I -- I -- I don't -- I do  
 2 not know in general terms. I mean --  
 3 Q. (BY MR. TATUM) Okay.  
 4 A. -- it's been, what, 200 years of laws, votes --  
 5 I don't know.  
 6 Q. Do you know if any member of LULAC has ever  
 7 expressed support for SB14?  
 8 A. I don't know that.  
 9 Q. Do you know if LULAC as an organization has  
 10 ever supported a voter identification bill?  
 11 A. I -- I -- I don't. I do not know that.  
 12 Q. Are you aware that the United States of America  
 13 is a party to this lawsuit?  
 14 A. If I knew?  
 15 Q. Yes, sir. Are you aware of that?  
 16 A. Yes.  
 17 Q. Are there any interests of LULAC that LULAC  
 18 feels are not adequately represented by the United  
 19 States of America in this lawsuit?  
 20 A. Repeat that.  
 21 Q. Sure. I'll state it another way. Does LULAC  
 22 believe that the United States of America does not  
 23 adequately represent the interests of LULAC in this  
 24 lawsuit?  
 25 MR. BARON: Objection; form, vague.

83

1 THE WITNESS: I don't think -- I don't  
 2 think the United States of America is representing  
 3 LULAC. I think they're a plaintiff, also.  
 4 Q. (BY MR. TATUM) And do you --  
 5 A. If I read the -- if I read the pleadings  
 6 correctly, I think they're also plaintiffs in this  
 7 case.  
 8 Q. Sure. I'm not asking whether or not the United  
 9 States represents LULAC. My question is, does LULAC  
 10 believe that its interests are not adequately  
 11 represented by the United States in its involvement in  
 12 this lawsuit?  
 13 MR. BARON: Objection; form. It also  
 14 seems to call for a legal conclusion.  
 15 THE WITNESS: The way I understand it, I  
 16 don't think the United States is representing any  
 17 interest that LULAC has.  
 18 Q. (BY MR. TATUM) Okay.  
 19 A. I mean, I'm talking about us lawyer, that  
 20 they're not --  
 21 Q. Okay.  
 22 A. They're plaintiffs.  
 23 MR. BARON: He's just looking for his next  
 24 question. Don't worry about it.  
 25 Q. (BY MR. TATUM) I've just got one more line of

84

1 questions that we've kind of already touched on, and  
 2 then I'll be done.  
 3 MR. BARON: Okay. We're here as long as  
 4 it takes for you to get done what you need to get done,  
 5 even though we would prefer it being sooner rather than  
 6 later.  
 7 MR. TATUM: Believe me, I share that  
 8 preference.  
 9 Q. (BY MR. TATUM) Mr. Ortiz, does LULAC as an  
 10 organization claim that it is being harmed by SB14?  
 11 A. The problem I have with that question that you  
 12 asked before is that LULAC is an organization, so LULAC  
 13 doesn't vote, so how can LULAC be harmed.  
 14 Q. So is it your testimony that LULAC as an  
 15 organization is not harmed by SB14?  
 16 MR. BARON: Object to form.  
 17 THE WITNESS: That's not what I'm saying  
 18 is --  
 19 MR. BARON: It calls for --  
 20 THE WITNESS: I don't know how to answer  
 21 that question.  
 22 Q. (BY MR. TATUM) Does LULAC believe that it is  
 23 negatively impacted by the -- by the implementation of  
 24 SB14?  
 25 A. LULAC believes that Senate Bill 14 affects the

85

1 right to vote to the Hispanic community and to the  
 2 minorities, and that's what LULAC believes. That's why  
 3 LULAC is part of this lawsuit.  
 4 Q. Does LULAC contend that the implementation of  
 5 SB14 has a negative impact on its resources, both  
 6 financial and other?  
 7 A. Say that again.  
 8 Q. Sure. Does LULAC contend that the  
 9 implementation of SB14 has a negative impact -- and let  
 10 me -- let me back up.  
 11 Does LULAC contend that the implementation  
 12 of SB14 has a negative effect on the resources of LULAC?  
 13 MR. BARON: I'm going to object. I think  
 14 this is repetitious, but go ahead and answer it.  
 15 THE WITNESS: Well, LULAC is involved in  
 16 this lawsuit, so, of course, it affects the resources  
 17 that LULAC have.  
 18 Q. (BY MR. TATUM) Outside of this lawsuit, has  
 19 SB14 had a negative impact on the resources of LULAC,  
 20 aside from anything dedicated towards the litigation of  
 21 this lawsuit?  
 22 MR. BARON: I'm going to object to the  
 23 form of that question because I'm not sure how you can  
 24 separate that out, but subject to that objection...  
 25 THE WITNESS: My question is just the

86

1 same -- I mean, my answer is the same. LULAC, its  
 2 resources and -- is impacted by the suit because they  
 3 are a plaintiff in this lawsuit. And the only way --  
 4 SBC was implemented, and LULAC got involved. So LULAC  
 5 is affected by expending their resources to defend the  
 6 minority -- the rights of the minorities just because of  
 7 the impact that SB14 has on minorities for the right to  
 8 vote, including Hispanics.  
 9 Q. (BY MR. TATUM) Does LULAC contend that the  
 10 resources that it is having to devote towards this  
 11 lawsuit are affecting its ability to fulfill its  
 12 mission?  
 13 A. The mission of LULAC is exactly what is  
 14 happening here. Protect the rights of minorities. If  
 15 those rights -- civil rights are affected the way LULAC  
 16 believes Senate Bill 14 affects the minorities right  
 17 now.  
 18 Q. So is LULAC pursuing this lawsuit in  
 19 furtherance of its mission?  
 20 A. Yes.  
 21 Q. Mr. Ortiz, I don't have any other questions for  
 22 you today. Before we go off record, is there anything  
 23 regarding any of your answers today that you would like  
 24 to clarify or amend?  
 25 A. No.

88

1 to review.  
 2 THE REPORTER: Got it. Okay. Thank you.  
 3 (Deposition concluded at 6:08 p.m.)  
 4  
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87

1 MR. TATUM: I pass the witness.  
 2 MR. BARON: We will reserve our questions  
 3 of Mr. Ortiz until trial. I'm sure he's looking  
 4 forward.  
 5 MR. TATUM: Mr. Ortiz, thank you very  
 6 much. We can go off the record.  
 7 THE REPORTER: For the record, counsel  
 8 have stipulated custody of the original transcript of  
 9 the deposition and exhibits marked will be maintained by  
 10 Mr. Tatum.  
 11 Do counsel have anything further to add to  
 12 the record?  
 13 MR. TATUM: Well, real quick, Eric, did  
 14 you have anything for Mr. Ortiz?  
 15 MR. RICH: No questions. Thank you.  
 16 MR. TATUM: Okay. Do you want that to be  
 17 on the record or --  
 18 MR. RICH: That's all right.  
 19 MR. BARON: I want the -- I want the  
 20 original sent to me. I don't want to waive signature.  
 21 THE REPORTER: You do want to waive or do  
 22 not?  
 23 MR. BARON: I do not.  
 24 THE REPORTER: Okay.  
 25 MR. BARON: Send me the original for him

89

1 CHANGES AND SIGNATURE  
 2 PAGE/LINE CHANGE REASON  
 3 \_\_\_\_\_  
 4 \_\_\_\_\_  
 5 \_\_\_\_\_  
 6 \_\_\_\_\_  
 7 \_\_\_\_\_  
 8 \_\_\_\_\_  
 9 \_\_\_\_\_  
 10 \_\_\_\_\_  
 11 \_\_\_\_\_  
 12 \_\_\_\_\_  
 13 \_\_\_\_\_  
 14 \_\_\_\_\_  
 15 \_\_\_\_\_  
 16 \_\_\_\_\_

90

1 I, MIGUEL ORTIZ, have read the foregoing deposition  
 2 and hereby affix my signature that same is true and  
 3 correct, except as noted above.  
 4  
 5 \_\_\_\_\_  
 6 MIGUEL ORTIZ  
 7  
 8 THE STATE OF \_\_\_\_\_)  
 9 COUNTY OF \_\_\_\_\_)  
 10  
 11 Before me, \_\_\_\_\_, on this  
 12 day personally appeared MIGUEL ORTIZ, known to me or  
 13 proved to me on the oath of \_\_\_\_\_ or through  
 14 \_\_\_\_\_ (description of identity card  
 15 or other document) to be the person whose name is  
 16 subscribed to the foregoing instrument and acknowledged  
 17 to me that he/she executed the same for the purpose and  
 18 consideration therein expressed.  
 19 Given under my hand and seal of office on this  
 20 \_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.  
 21  
 22 \_\_\_\_\_  
 23 NOTARY PUBLIC IN AND FOR  
 24 THE STATE OF \_\_\_\_\_  
 25 My Commission Expires: \_\_\_\_\_

92

1 If returned, the attached Changes and  
 2 Signature Page contains any changes and the reasons  
 3 therefor;  
 4 \_\_\_\_\_ was not requested by the deponent or a  
 5 party before the completion of the deposition.  
 6 I further certify that I am neither attorney  
 7 nor counsel for, related to, nor employed by any of the  
 8 parties to the action in which this testimony was taken.  
 9 Further, I am not a relative or employee of any attorney  
 10 of record in this cause, nor am I financially or  
 11 otherwise interested in the outcome of the action.  
 12 Subscribed and sworn to on this the \_\_\_\_ day  
 13 of \_\_\_\_\_, \_\_\_\_\_.  
 14  
 15  
 16 \_\_\_\_\_  
 17 JODI CARDENAS, RPR, Texas CSR  
 18 INTEGRITY LEGAL SUPPORT SOLUTIONS  
 19 3100 West Slaughter Lane, Suite A-101  
 20 Austin, Texas 78748  
 21 (512) 320-8690  
 22 (512) 320-8692 (fax)  
 23  
 24  
 25

91

1 IN THE UNITED STATES DISTRICT COURT  
 2 FOR THE SOUTHERN DISTRICT OF TEXAS  
 3 CORPUS CHRISTI DIVISION  
 4 MARC VEASEY, et al., )  
 5 )  
 6 Plaintiffs, )  
 7 )  
 8 VS. ) CIVIL ACTION  
 9 ) NO. 2:13-CV-00193  
 10 RICK PERRY, et al., )  
 11 )  
 12 Defendants. )  
 13  
 14

## REPORTER'S CERTIFICATION

10 ORAL DEPOSITION OF  
 11 MIGUEL ORTIZ  
 12 AUGUST 14, 2014  
 13  
 14

15 I, Jodi Cardenas, TCRR, RPR, Certified  
 16 Shorthand Reporter in and for the State of Texas, hereby  
 17 certify to the following:  
 18 That the witness, MIGUEL ORTIZ, was duly sworn  
 19 and that the transcript of the deposition is a true  
 20 record of the testimony given by the witness;  
 21 I further certify that pursuant to FRCP Rule  
 22 30(f)(1) that the signature of the deponent:  
 23 \_\_\_\_\_ was requested by the deponent or a party  
 24 before the completion of the deposition and returned  
 25 within 30 days from date of receipt of the transcript.

<hr/> <p style="text-align: center;">\$</p> <hr/> <p><b>\$15</b> 29:9</p> <p><b>\$30</b> 29:7,8,12 30:16,21,23 31:1,2,3,4,5</p> <p><b>\$75</b> 29:6,11 30:19</p> <hr/> <p style="text-align: center;">1</p> <hr/> <p><b>1</b> 4:3 13:22,24 15:1,25 17:1 27:24 50:24 57:12,18,20 73:4</p> <p><b>10</b> 11:25</p> <p><b>100,000</b> 63:21,22</p> <p><b>11</b> 28:24 29:1</p> <p><b>14</b> 1:11,17 36:10 37:2 55:17,23 60:23 66:15,16,23 77:16 84:25 86:16 91:13</p> <p><b>14th</b> 1:20 2:9 5:8 77:20</p> <p><b>15</b> 17:8,10</p> <p><b>17</b> 60:17</p> <p><b>18</b> 29:16 30:8,13</p> <hr/> <p style="text-align: center;">2</p> <hr/> <p><b>2</b> 4:4 14:6 15:3,5 25:9 51:12</p> <p><b>2:13-cv-00193</b> 1:5 91:5</p> <p><b>200</b> 82:4</p> <p><b>2000</b> 10:22,24</p> <p><b>2005</b> 17:15</p> <p><b>2010</b> 11:25</p> <p><b>2011</b> 36:10,18 37:3 38:13 39:20,23 40:19,23 55:17</p> <p><b>2013</b> 67:13,19,25 68:6 72:9 77:4,8,12</p> <p><b>2014</b> 1:11,17 14:13 77:16,20 91:13</p>	<p><b>202</b> 2:15</p> <p><b>20530</b> 2:15</p> <p><b>209</b> 1:20 2:9</p> <p><b>21</b> 13:11,12</p> <p><b>22nd</b> 67:25 77:8</p> <p><b>242</b> 2:4</p> <p><b>25</b> 9:6</p> <p><b>26</b> 72:8 77:4</p> <p><b>26th</b> 67:13,19</p> <p><b>281</b> 2:5</p> <p><b>29</b> 15:25</p> <p><b>29th</b> 9:18</p> <p><b>2nd</b> 35:3</p> <hr/> <p style="text-align: center;">3</p> <hr/> <p><b>3</b> 4:5 19:3,5 34:2 55:10</p> <p><b>3:31</b> 1:17</p> <p><b>3:57</b> 5:9</p> <p><b>30</b> 9:6 29:1,4 64:9 91:25</p> <p><b>30(b) (6</b> 56:3,20 57:5,8 58:5,15 59:4 60:14,21 73:10</p> <p><b>30(f) (1</b> 91:22</p> <p><b>305-0107</b> 2:15</p> <p><b>30th</b> 71:17</p> <p><b>3100</b> 92:17</p> <p><b>320-8690</b> 92:18</p> <p><b>320-8692</b> 92:18</p> <p><b>3rd</b> 14:13</p> <hr/> <p style="text-align: center;">4</p> <hr/> <p><b>4</b> 4:6 15:20,21,23 24:13,15 25:7 33:24 51:11 71:9</p> <p><b>40</b> 64:9</p> <p><b>400</b> 50:19</p>	<p><b>463-2110</b> 2:10</p> <hr/> <p style="text-align: center;">5</p> <hr/> <p><b>5</b> 4:7 71:1,4,7,11,13</p> <p><b>5:00</b> 53:15</p> <p><b>50/50</b> 30:22</p> <p><b>512</b> 2:10 92:18</p> <p><b>517</b> 2:4</p> <p><b>534-2748</b> 2:5</p> <p><b>5th</b> 35:4</p> <hr/> <p style="text-align: center;">6</p> <hr/> <p><b>6</b> 77:12</p> <p><b>6:08</b> 1:17 88:3</p> <p><b>67</b> 9:18</p> <p><b>6th</b> 68:6</p> <hr/> <p style="text-align: center;">7</p> <hr/> <p><b>7254</b> 2:14</p> <p><b>75</b> 29:4</p> <p><b>77539</b> 2:5</p> <p><b>78701</b> 2:10</p> <p><b>78748</b> 92:17</p> <p><b>7th</b> 1:21 2:9 5:10</p> <hr/> <p style="text-align: center;">9</p> <hr/> <p><b>9</b> 61:10</p> <p><b>914</b> 2:4</p> <p><b>950</b> 2:14</p> <hr/> <p style="text-align: center;">A</p> <hr/> <p><b>A-101</b> 92:17</p> <p><b>ability</b> 65:8 86:11</p> <p><b>able</b> 64:18 65:2,5,7 66:1,24 67:5 70:11 75:6 76:16 79:6</p> <p><b>above-styled</b> 1:16</p> <p><b>Absolutely</b> 57:1</p> <p><b>acceptable</b> 63:17</p>
--	--	--

<p>64:14,19 66:2 70:1 72:8,15 74:16 75:7,20 76:17,25 77:5,10,14,18</p> <p><b>account</b> 31:16 55:17</p> <p><b>accounting</b> 10:4</p> <p><b>accumulated</b> 80:21</p> <p><b>accuracy</b> 72:24</p> <p><b>accurate</b> 6:13 19:25 20:1</p> <p><b>accurately</b> 7:19,23 8:1 55:21</p> <p><b>Acevedo</b> 35:20</p> <p><b>achieve</b> 55:18</p> <p><b>achieving</b> 34:3</p> <p><b>acknowledge</b> 79:11</p> <p><b>acknowledged</b> 90:16</p> <p><b>acting</b> 63:13</p> <p><b>action</b> 1:5 91:5 92:8,11</p> <p><b>active</b> 9:20,22 10:21 46:16,20</p> <p><b>activities</b> 34:15,20 35:12,14,17 36:9 37:1 42:7 43:12,13,16 46:2 47:15,21 48:24 53:8 54:2,7,14</p> <p><b>actual</b> 13:14 46:19,20 47:10</p> <p><b>actually</b> 10:23 32:6 33:9 36:12,16 46:4 47:8,23 48:6</p> <p><b>add</b> 87:11</p> <p><b>addition</b> 13:19 74:13</p> <p><b>additional</b> 59:9 60:1 66:23</p> <p><b>address</b> 22:17 24:23</p> <p><b>adequate</b> 41:9,12</p> <p><b>adequately</b> 41:1</p>	<p>82:18,23 83:10</p> <p><b>advancement</b> 51:16</p> <p><b>advancing</b> 51:2,7,23</p> <p><b>advice</b> 12:11</p> <p><b>advise</b> 12:7 13:3,18 36:1</p> <p><b>adviser</b> 11:15,16 12:5,14 36:20,23</p> <p><b>advocacy</b> 34:19,20 35:10</p> <p><b>advocacy-related</b> 35:17 36:9</p> <p><b>advocate</b> 25:14</p> <p><b>advocating</b> 32:21 49:24</p> <p><b>affect</b> 22:19 33:17 60:3 66:13</p> <p><b>affected</b> 24:5 35:9 69:13 86:5,15</p> <p><b>affecting</b> 35:7 86:11</p> <p><b>affects</b> 12:8 24:7 27:18 40:14 48:10 50:3 60:2 84:25 85:16 86:16</p> <p><b>affix</b> 90:2</p> <p><b>afternoon</b> 5:6</p> <p><b>against</b> 24:7 40:13 55:16 59:11</p> <p><b>age</b> 30:8</p> <p><b>ago</b> 47:14</p> <p><b>ahead</b> 19:13 22:10 59:7 85:14</p> <p><b>al</b> 1:3,6 2:3 91:3,6</p> <p><b>allegation</b> 56:22 80:11</p> <p><b>allegations</b> 56:24</p> <p><b>alliance</b> 43:10</p> <p><b>allocate</b> 45:18</p> <p><b>allocated</b> 44:2</p>	<p><b>allocation</b> 45:12</p> <p><b>allocations</b> 45:13</p> <p><b>allow</b> 6:18 69:16,24 75:1 76:4,10,23</p> <p><b>allowed</b> 78:4</p> <p><b>already</b> 9:8,12 30:13,19 52:18 72:10 84:1</p> <p><b>am</b> 28:2,5 71:12 92:6,9,10</p> <p><b>amend</b> 86:24</p> <p><b>amended</b> 4:5 19:15</p> <p><b>amendments</b> 40:22</p> <p><b>America</b> 82:12,19,22 83:2</p> <p><b>American</b> 14:12 15:14 16:12 25:14,25</p> <p><b>Americans</b> 24:4</p> <p><b>amongst</b> 64:10</p> <p><b>amount</b> 31:2</p> <p><b>analysis</b> 17:13 80:18 81:2</p> <p><b>annual</b> 45:11</p> <p><b>answer</b> 6:17,19,21 7:7 22:10,11 37:24 38:15 40:20 41:6 50:11 53:21 54:10 56:9 57:10 58:8,19 59:7,16 62:19 63:1 65:11 66:4 67:3,23 75:13 76:20 78:1 79:10,14 80:9 84:20 85:14 86:1</p> <p><b>answering</b> 7:18,22 8:1</p> <p><b>answers</b> 6:9 16:14 57:17 60:20 76:12 86:23</p> <p><b>anticipate</b> 6:17</p> <p><b>Antonio</b> 5:15 11:4,5,9</p> <p><b>anybody</b> 53:3</p> <p><b>anyone</b> 8:22 22:16</p>
---	---	--



<p>32:16 49:19 66:7 79:13</p> <p><b>anything</b> 6:1 7:25 9:11 18:14 25:23 29:18 40:12 42:1,5 47:2 50:25 62:22 85:20 86:22 87:11,14</p> <p><b>anyway</b> 12:12 52:12</p> <p><b>anywhere</b> 53:3</p> <p><b>appearances</b> 2:1 37:8</p> <p><b>Appearances</b>..... ..... .....2 3:3</p> <p><b>appeared</b> 90:12</p> <p><b>applicable</b> 62:23</p> <p><b>application</b> 29:20,21,22 30:7,14 47:11 62:18 67:2 76:8,20</p> <p><b>applied</b> 62:20</p> <p><b>applies</b> 67:1</p> <p><b>apply</b> 61:18 62:16 72:9</p> <p><b>applying</b> 62:21</p> <p><b>appointees</b> 13:15</p> <p><b>appreciate</b> 62:12</p> <p><b>approval</b> 22:4</p> <p><b>approved</b> 12:11 45:19</p> <p><b>areas</b> 34:10</p> <p><b>argumentative</b> 52:13</p> <p><b>Army</b> 9:20 10:13</p> <p><b>arrangement</b> 54:11</p> <p><b>articles</b> 39:25</p> <p><b>aside</b> 15:1 45:22 59:10 60:1 85:20</p> <p><b>as-needed</b> 45:22,24</p> <p><b>assist</b> 19:20 52:7</p> <p><b>assistant</b> 2:9 5:7</p> <p><b>assuming</b> 71:20</p>	<p><b>attached</b> 92:1</p> <p><b>attainment</b> 25:15</p> <p><b>attempt</b> 78:25 79:3</p> <p><b>attempted</b> 65:13,21,22 66:2</p> <p><b>attempting</b> 78:15,19 79:8 80:4</p> <p><b>attend</b> 22:15 42:25</p> <p><b>attended</b> 42:12 49:7</p> <p><b>attending</b> 42:17</p> <p><b>attorney</b> 1:20 2:9 5:7,9 7:5 92:6,9</p> <p><b>attorney-client</b> 23:1</p> <p><b>attorneys</b> 81:16</p> <p><b>audit</b> 17:13</p> <p><b>audits</b> 17:12</p> <p><b>August</b> 1:11,17 5:8 67:25 77:8,16,20 91:13</p> <p><b>Austin</b> 1:21 2:10 5:10 36:2 92:17</p> <p><b>Avenue</b> 2:14</p> <p><b>avoid</b> 6:10,16,24</p> <p><b>aware</b> 16:11 52:11 82:12,15</p> <hr/> <p style="text-align: center;">B</p> <hr/> <p><b>bachelor's</b> 10:3</p> <p><b>background</b> 9:25 10:11</p> <p><b>baffled</b> 59:23</p> <p><b>ball</b> 35:3</p> <p><b>bank</b> 31:16</p> <p><b>Baron</b> 2:3,4 5:20,21 11:12 14:14 17:16,18,25 18:2,7 19:1 22:9 24:18 27:25 28:5 31:21,24 32:8,12 36:14 38:2,5,8 41:7 47:12,18 50:10</p>	<p>52:1,12,22</p> <p>53:11,14,19 54:21</p> <p>56:1,18 57:1,7</p> <p>58:14,18 59:2 60:11</p> <p>61:6,21 62:5,9 65:16</p> <p>66:5,8,10,16</p> <p>67:15,17</p> <p>68:2,9,16,23 69:1,7</p> <p>73:5,21 74:1 77:23</p> <p>78:8,10 80:6</p> <p>81:14,25 82:25</p> <p>83:13,23 84:3,16,19</p> <p>85:13,22</p> <p>87:2,19,23,25</p> <p><b>based</b> 11:4 37:23 56:15 66:21,22 74:15 79:20</p> <p><b>Basic</b> 10:14</p> <p><b>basically</b> 45:19 46:10</p> <p><b>basis</b> 12:20 16:24 41:8 45:22,24 56:2 57:21,25 58:10</p> <p><b>become</b> 11:24 30:20 33:9</p> <p><b>becomes</b> 29:14 33:5</p> <p><b>begin</b> 6:19</p> <p><b>beginning</b> 57:14 72:1,8</p> <p><b>behalf</b> 16:15 52:17 57:9 58:4</p> <p><b>belief</b> 56:15 59:18,24</p> <p><b>beliefs</b> 73:16</p> <p><b>believe</b> 19:23 24:20 25:19 36:11 40:13,25 41:20,22 47:16 50:7 55:8 56:13,14 59:20,24 70:6 72:20 76:15 78:14,18,24 79:1,2,7,17,20,22,25 80:3 82:22 83:10 84:7,22</p> <p><b>believed</b> 37:6</p> <p><b>believes</b> 24:6 58:25 59:9,12,19 79:5</p>
---	---	---

<p>84:25 85:2 86:16</p> <p><b>belong</b> 30:9</p> <p><b>belongs</b> 30:2</p> <p><b>Belton</b> 11:5</p> <p><b>benefit</b> 32:23,24 33:11,13,18 40:14</p> <p><b>benefits</b> 33:7</p> <p><b>Benning</b> 9:17</p> <p><b>best</b> 6:24 39:19</p> <p><b>bet</b> 28:22</p> <p><b>better</b> 26:8 60:19</p> <p><b>biggest</b> 64:4,5</p> <p><b>bill</b> 36:9 37:2 38:20 42:2,14,16 55:17,23 60:23 66:15,16,18,23 82:10 84:25 86:16</p> <p><b>binding</b> 16:14</p> <p><b>biological</b> 10:12,16</p> <p><b>bit</b> 9:24 10:11 34:19</p> <p><b>blast</b> 37:1</p> <p><b>board</b> 12:7,10,13,15 13:4,7,13,14,18,19 20:14,15,18,24 21:1,3,15,17 22:5,6,17,21,23 23:8,12,13 26:9,11,12,15,25 27:2,3 31:5 36:1 44:6,23 45:19,21 49:8,9</p> <p><b>boards</b> 26:24</p> <p><b>bold</b> 14:10 71:19</p> <p><b>book</b> 27:9 74:18</p> <p><b>born</b> 9:16,17</p> <p><b>bottom</b> 14:9 15:23</p> <p><b>branch</b> 25:20 26:7</p> <p><b>break</b> 53:10,15 68:18</p> <p><b>briefing</b> 42:11 43:2 48:22</p>	<p><b>briefings</b> 42:25</p> <p><b>briefly</b> 62:25</p> <p><b>bring</b> 9:8 22:18,20</p> <p><b>brings</b> 22:22</p> <p><b>brought</b> 9:19 23:11,16</p> <p><b>budget</b> 45:12,14</p> <p><b>budgets</b> 45:16</p> <p><b>bullet</b> 34:7,18</p> <p><b>bulleted</b> 73:3</p> <p><b>bunch</b> 10:13</p> <p><b>business</b> 10:4</p> <hr/> <p style="text-align: center;">C</p> <hr/> <p><b>calculation</b> 17:12 80:18</p> <p><b>California</b> 28:5</p> <p><b>capital</b> 14:9</p> <p><b>Capitol</b> 35:21 39:7</p> <p><b>capture</b> 71:15</p> <p><b>captured</b> 24:16</p> <p><b>card</b> 59:11 60:2 66:24 74:17,19 90:14</p> <p><b>Cardenas</b> 1:18 91:15 92:16</p> <p><b>case</b> 13:1 21:13 56:17 57:25 79:21 81:11 83:7</p> <p><b>cases</b> 11:11</p> <p><b>categorized</b> 52:5</p> <p><b>category</b> 57:3</p> <p><b>cause</b> 1:16 92:10</p> <p><b>certain</b> 39:5 40:20 54:2</p> <p><b>certainly</b> 60:14</p> <p><b>certainty</b> 28:21 40:18</p> <p><b>certificate</b> 61:13 70:18,24 71:23 72:10 74:20</p>	<p><b>Certificate</b>.....9 .....9 1 3:6</p> <p><b>CERTIFICATION</b> 91:9</p> <p><b>Certified</b> 91:15</p> <p><b>certify</b> 91:17,21 92:6</p> <p><b>cetera</b> 34:12</p> <p><b>chain</b> 48:19</p> <p><b>chair</b> 13:15 35:19,20 39:6</p> <p><b>chance</b> 6:13 16:10</p> <p><b>CHANGE</b> 89:2</p> <p><b>changes</b> 3:6 28:22 62:9 89:1 92:1,2</p> <p><b>charge</b> 72:10</p> <p><b>charters</b> 28:8,9</p> <p><b>chase</b> 19:2</p> <p><b>check</b> 39:18</p> <p><b>chemical</b> 10:12,16</p> <p><b>chosen</b> 67:8</p> <p><b>Christi</b> 1:2 42:23 50:24 91:2</p> <p><b>citizens</b> 14:12 15:15 16:13 25:14 26:1 61:18 62:16</p> <p><b>citizenship</b> 74:20</p> <p><b>city</b> 39:20</p> <p><b>civic</b> 34:10</p> <p><b>civil</b> 1:5,22 25:16 32:6 34:11 44:14 46:24 47:1,3,24 48:10 49:21 86:15 91:5</p> <p><b>Civilian</b> 10:1,3</p> <p><b>claim</b> 58:11 84:10</p> <p><b>claims</b> 57:21,25</p> <p><b>clarify</b> 86:24</p> <p><b>clarity</b> 38:12</p>
---	---	--

<b>class</b> 32:24 <b>classes</b> 55:16 <b>clear</b> 73:25 <b>clearly</b> 6:12 7:1 <b>college</b> 44:17 46:14 <b>combination</b> 11:9 <b>comes</b> 35:20 39:7 43:11 50:3 <b>coming</b> 36:2 37:14 <b>command</b> 48:19 <b>Commission</b> 90:25 <b>committee</b> 2:9 35:19 <b>committees</b> 13:16 <b>commonly</b> 61:14 <b>communicated</b> 80:11 <b>communication</b> 36:25 <b>community</b> 24:8 30:4 32:18 33:13 35:7 66:14 85:1 <b>compensated</b> 12:19,25 <b>complaint</b> 19:15,18,21,24 23:20 55:8,12 56:22,25 <b>Complaint.....</b> .19 4:5 <b>complete</b> 44:10 <b>completion</b> 91:24 92:5 <b>component</b> 26:3 <b>composed</b> 26:15 28:24 63:24 <b>comprised</b> 13:14 <b>comprises</b> 13:6 <b>compromise</b> 49:19 <b>computerized</b> 1:19 <b>concealed</b> 61:12 74:18 <b>concern</b> 23:7 34:25 80:11 <b>concerning</b> 36:17	<b>concluded</b> 88:3 <b>conclusion</b> 54:22 58:18 83:14 <b>conclusions</b> 59:5 <b>condition</b> 25:14 <b>conduct</b> 81:8 <b>conducted</b> 35:17 39:4 48:23 80:17 81:1,6 <b>conducts</b> 47:19 <b>conference</b> 8:23 9:1,5 <b>conferences</b> 37:10 <b>confidentiality</b> 23:4 <b>confused</b> 75:15 <b>congressmens</b> 34:23 <b>consider</b> 22:6 32:11 46:21 48:8 <b>consideration</b> 39:3,23 42:2,8 90:18 <b>considered</b> 40:22 <b>considering</b> 22:4 <b>consistent</b> 21:25 <b>constituents</b> 32:11 <b>constitute</b> 51:23 52:2 <b>constitution</b> 27:8 <b>consulted</b> 23:19 <b>contained</b> 16:8,11,17 19:24 72:21 <b>contains</b> 92:2 <b>contend</b> 53:25 54:16,19 55:5 58:6 63:2,10,16 64:13 66:6,9 85:4,8,11 86:9 <b>contending</b> 54:23,25 <b>contends</b> 66:12 <b>contention</b> 66:21 <b>contentions</b> 16:24 54:25 73:17	<b>contribute</b> 31:16 <b>control</b> 31:8,13 45:3,8 <b>convention</b> 29:3,4 45:16 <b>corporate</b> 43:10,21 <b>Corpus</b> 1:2 42:22,23 50:24 91:2 <b>correct</b> 15:15 21:1 22:19 26:9 36:20,23 37:21 38:21,25 40:17 43:6,7 47:17 58:4 59:1 74:7 90:3 <b>correctly</b> 13:11 29:10 36:13 38:6 40:6 83:6 <b>council</b> 27:5,7 28:23,25 29:2,4,5,6,11,25 30:9,13,15,19,21 31:15 44:8,25 45:11 46:11 49:2,3,12 50:13,16,24 53:6 <b>councils</b> 27:5 31:15 43:15 46:14,20 49:5,6 50:17 52:20 53:5 54:13 <b>counsel</b> 5:16 8:21 12:24 87:7,11 92:7 <b>countless</b> 60:18 <b>COUNTY</b> 90:9 <b>course</b> 12:24 28:11 35:9 57:2 59:2 60:16 85:16 <b>courses</b> 10:16 <b>court</b> 1:1 6:12 91:1 <b>cover</b> 6:7 43:18 <b>CSR</b> 1:18 92:16 <b>current</b> 61:2,3,10 <b>currently</b> 9:22 10:6,25 65:7 69:4 75:24 <b>custody</b> 87:8
---	---	--

<hr/> <p style="text-align: center;">D</p> <hr/> <p><b>D.C</b> 35:3</p> <p><b>date</b> 14:4,13 19:2 68:13,21 77:16,20 91:25</p> <p><b>day</b> 8:25 9:2,3 21:20,21 41:11 42:12,17 90:12,20 92:12</p> <p><b>days</b> 9:3 91:25</p> <p><b>DC</b> 2:15</p> <p><b>deal</b> 30:2 35:1,11 43:16</p> <p><b>December</b> 68:6 77:12</p> <p><b>decide</b> 19:1 20:19 21:16</p> <p><b>deciding</b> 23:21</p> <p><b>decision</b> 20:11</p> <p><b>decisions</b> 20:13</p> <p><b>dedicated</b> 85:20</p> <p><b>defend</b> 86:5</p> <p><b>Defendant</b> 14:11</p> <p><b>defendants</b> 1:7,15 2:8 5:8 13:2 91:7</p> <p><b>defenses</b> 57:22 58:1</p> <p><b>defer</b> 58:21,22</p> <p><b>define</b> 77:25</p> <p><b>degree</b> 10:3,5</p> <p><b>delay</b> 42:2</p> <p><b>delegates</b> 29:3</p> <p><b>Department</b> 2:13,14 4:7 71:16,21</p> <p><b>depending</b> 12:10 21:6 35:23 48:5</p> <p><b>depends</b> 11:8,11 12:24 21:13 23:5</p> <p><b>depo</b> 6:1 57:13</p> <p><b>deponent</b> 57:8</p>	<p>91:22,23 92:4</p> <p><b>depos</b> 5:24</p> <p><b>deposed</b> 5:22 6:2</p> <p><b>deposition</b> 1:9,14 6:7 8:9,12 9:12 14:12 15:2,12,14,18 39:18 56:20,23 59:4 60:14 87:9 88:3 90:1 91:11,19,24 92:5</p> <p><b>Deposition</b>..... .....13 4:3</p> <p><b>Deposition</b>..... .....15 4:4</p> <p><b>describe</b> 35:16</p> <p><b>described</b> 16:15 59:18</p> <p><b>description</b> 4:2 90:14</p> <p><b>designated</b> 16:12 18:20 58:3</p> <p><b>designed</b> 31:12 60:3</p> <p><b>designee</b> 60:21</p> <p><b>determine</b> 76:16,24</p> <p><b>deterrence</b> 80:8</p> <p><b>deters</b> 80:4</p> <p><b>development</b> 34:11</p> <p><b>deviate</b> 21:25 55:1</p> <p><b>deviation</b> 25:23</p> <p><b>devote</b> 86:10</p> <p><b>Dickinson</b> 2:5</p> <p><b>different</b> 14:4 26:2 28:8 55:3</p> <p><b>differently</b> 35:10 62:10</p> <p><b>direct</b> 16:21 27:4 32:7 33:18</p> <p><b>directive</b> 27:6</p> <p><b>directly</b> 12:8 18:13 41:16 46:25</p>	<p><b>director</b> 13:8,9 21:2 27:5 49:11</p> <p><b>directors</b> 13:10 22:18,20,23 26:24 27:4 49:11</p> <p><b>discharged</b> 10:20</p> <p><b>disclosures</b> 44:9</p> <p><b>discriminating</b> 55:16</p> <p><b>discriminatory</b> 54:17,20 58:7,25 59:11,21,25</p> <p><b>discussed</b> 22:25 23:5 78:5 79:12,13</p> <p><b>discussion</b> 22:24 78:12</p> <p><b>disenfranchises</b> 55:24</p> <p><b>disenfranchising</b> 55:15 56:11</p> <p><b>dispute</b> 73:1</p> <p><b>distinguish</b> 52:16</p> <p><b>distracting</b> 8:7</p> <p><b>district</b> 1:1 13:10 22:19,20,22 27:3,4 43:15 46:11 49:11 91:1</p> <p><b>district-level</b> 44:8</p> <p><b>districts</b> 13:12</p> <p><b>divert</b> 54:1,4,6,13</p> <p><b>divide</b> 26:1 64:4</p> <p><b>divided</b> 26:6,20 29:8</p> <p><b>DIVISION</b> 1:2 91:2</p> <p><b>document</b> 13:25 14:3 15:8,10 19:6,8 72:24 73:6 90:15</p> <p><b>documentation</b> 50:14 51:22</p> <p><b>documents</b> 9:9 60:18 64:25 65:3,9</p> <p><b>donations</b> 43:10,22,25</p> <p><b>done</b> 6:23 17:19 18:5</p>
--	---	---

46:9 50:24 81:16 84:2,4 <b>doubt</b> 25:1 <b>DPS</b> 61:1 <b>draft</b> 40:21 <b>driver's</b> 70:20 74:17 <b>drives</b> 46:12 47:20 48:2,9 <b>due</b> 29:5 <b>dues</b> 28:11,18,19 <b>duly</b> 1:15 5:3 91:18 <b>during</b> 35:4 36:10,13,24 37:3,13,15,21 38:17 39:2,22,23 41:19 52:7 <b>duty</b> 9:20,22 10:21 <hr/> E <hr/> <b>easier</b> 6:23 <b>economic</b> 25:14 34:11 <b>educate</b> 43:4 48:11,17,24 49:9,12 <b>educated</b> 42:13 <b>educates</b> 50:8 <b>educating</b> 48:15 49:15 50:1 51:21 <b>education</b> 10:14 25:15 34:12 44:13 <b>educational</b> 9:25 10:10 31:17 42:10,20,25 43:2 48:18,22 <b>effect</b> 17:13 85:12 <b>effects</b> 56:3 <b>effort</b> 55:18 <b>efforts</b> 33:12 41:24 <b>EIC</b> 61:15 64:25 65:4,10,13,22 71:25 72:12,18 74:6,13,21	<b>eight</b> 26:23 <b>either</b> 10:2 18:5 39:18 42:23 50:23 52:22 61:1 73:1 <b>election</b> 61:12 67:5,9 70:17,23 71:23 72:9 <b>elections</b> 52:8 72:4 <b>eligible</b> 72:11,18 78:22 79:6 <b>else</b> 7:25 8:22 9:11 42:5 43:3 78:25 79:4 81:8 <b>elsewhere</b> 54:3 <b>e-mail</b> 36:25 <b>employed</b> 10:25 92:7 <b>employee</b> 61:11 92:9 <b>employer</b> 11:2 <b>enacted</b> 36:10 37:3 54:16,19 58:6 <b>enacting</b> 63:3 66:14 <b>enactment</b> 38:14 39:22 <b>encompass</b> 47:2 <b>encourage</b> 47:21,22 48:19 53:7 <b>Encouraging</b> 47:6 <b>endorsement</b> 30:9 <b>engage</b> 35:13 36:8 <b>engaged</b> 42:8 <b>engages</b> 34:16 46:2 47:15 <b>enlighten</b> 35:21 <b>ensure</b> 48:20,21 49:21 50:4 <b>entities</b> 45:11 <b>entity</b> 18:8 <b>equally</b> 61:18 62:16 <b>Eric</b> 2:13 14:21 87:13 <b>especially</b> 55:16	<b>establish</b> 73:17 <b>established</b> 30:13 74:23 <b>estimates</b> 17:12 <b>et</b> 1:3,6 2:3 34:12 91:3,6 <b>ethnicity</b> 55:17 <b>event</b> 52:4 <b>events</b> 10:16 <b>everybody</b> 27:8 37:25 47:25 48:3 <b>everyone</b> 46:4 53:10 <b>everything</b> 8:14 43:1 <b>exact</b> 64:3 <b>exactly</b> 37:9 54:25 86:13 <b>Examination</b> 3:5 5:4 <b>example</b> 20:16 23:2 33:14 34:21 35:2 36:2 48:13,16 <b>examples</b> 34:21 <b>except</b> 90:3 <b>executed</b> 90:17 <b>executive</b> 12:7 13:4,7,13,19 20:14,15,18,24,25 21:15 22:5,16 23:2,3 26:9,11 31:5,10 <b>exempt</b> 72:4 <b>exemptions</b> 72:5 <b>exhibit</b> 13:22,24 14:25 15:1,3,5 19:3,5 24:12,13,15 25:7 33:24 51:11 55:8 71:11,13 <b>exhibits</b> 4:1 58:23 87:9 <b>exist</b> 30:3 <b>exists</b> 79:11,15,17 <b>expending</b> 86:5
--	---	--

<b>expenses</b> 43:18 <b>expert</b> 56:3 57:9 60:17 <b>expertise</b> 80:7 <b>experts</b> 58:12,23 76:11 80:21 81:11 <b>Expires</b> 90:25 <b>explain</b> 65:5 <b>explained</b> 22:3 43:1 <b>explanation</b> 43:4 <b>express</b> 23:7 34:24 35:6 <b>expressed</b> 81:19 82:7 90:18 <b>extent</b> 18:2,3 56:19 <b>eyes</b> 12:12 <hr/> F <hr/> <b>fact-based</b> 60:12 <b>factual</b> 16:24 57:21,25 <b>fair</b> 37:7 <b>familiar</b> 24:21 60:5,8 70:14,16 <b>family</b> 11:9,10 53:7 <b>favor</b> 63:6,7 <b>fax</b> 92:18 <b>Federal</b> 1:21 <b>fee</b> 29:12,13 <b>feel</b> 57:10 <b>feeling</b> 7:15 <b>feels</b> 82:18 <b>fees</b> 43:9,24 <b>festivals</b> 46:13 <b>Fidel</b> 35:20 <b>field</b> 76:19 <b>file</b> 8:13 20:13,20 58:22	<b>filed</b> 19:16 20:6,10 21:5 76:7 <b>files</b> 30:7 <b>fill</b> 29:19 30:14 48:2 <b>financial</b> 44:10 85:6 <b>financially</b> 92:10 <b>fine</b> 53:11 65:18 <b>finish</b> 6:18,20 <b>first</b> 4:5 5:3 11:24 19:15 20:3 22:13 23:15 25:7 34:2,6 51:11 55:12,13 63:20 73:6 <b>five</b> 12:4 17:4 53:15 71:2 <b>five-minute</b> 53:15 <b>Floor</b> 1:21 2:9 5:10 <b>FM</b> 2:4 <b>forced</b> 54:1,5 <b>foregoing</b> 90:1,16 <b>forgot</b> 26:19 <b>form</b> 22:9,11 29:5 31:21,25 32:12 47:12,18 50:10 52:1,12 53:19 54:21 66:3,5,8 67:15,17 68:2,9,16,23 69:7,20 70:1 75:7,20 76:9,17,25 77:6,10,14,18,23 78:8 80:6 81:25 82:25 83:13 84:16 85:23 <b>forms</b> 63:17 64:15,19 70:3 72:8,11,14,15,17,19 73:2,13,24 74:10,11,12,16,24 <b>Fort</b> 9:17 11:8 <b>forum</b> 47:20 <b>forward</b> 87:4	<b>foundation</b> 24:2 <b>frames</b> 65:23 <b>fraud</b> 79:11,17,22 80:1,2,5,12,19 81:3 <b>FRCP</b> 91:21 <b>free</b> 57:10 <b>Frequently</b> 25:8 <b>friends</b> 53:7 <b>front</b> 23:21 33:25 36:17 41:2,15 55:10 74:2 <b>fulfill</b> 86:11 <b>fulfilling</b> 50:8 <b>full</b> 5:12 <b>functions</b> 43:18 45:17,20 <b>fund</b> 31:7,8,9 <b>funding</b> 31:14 43:8,11,19 <b>fundraiser</b> 45:2,7 <b>fund-raising</b> 31:14,16 43:12,13,16 <b>fund-raising</b> 43:25 <b>funds</b> 31:17 43:24 44:1,11,23 45:3,4,8,12,18,21 <b>furtherance</b> 86:19 <b>future</b> 75:21 76:10 <hr/> G <hr/> <b>general</b> 1:20 2:9 5:7 16:20 21:18 24:4,8,10 30:2 81:24 82:2 <b>generally</b> 60:8 <b>general's</b> 5:10 <b>generated</b> 43:24 <b>Georgia</b> 9:17 <b>gets</b> 20:19 21:5 22:24
--	---	--



24:5 35:9 <b>getting</b> 36:25 <b>given</b> 40:25 44:5 90:19 91:20 <b>gladly</b> 7:1 <b>goal</b> 44:12,13 <b>government</b> 61:11 <b>graduated</b> 10:23 <b>graphics</b> 80:21 <b>ground</b> 6:6 <b>group</b> 17:15 30:5,6 63:3,11 73:15 <b>guess</b> 13:9 22:24 23:9 26:7 31:13 32:25 33:19 35:21 37:14 45:17,20 47:21 48:4 49:10 50:5 80:22 81:15 <b>guy</b> 49:9 <hr/> H <hr/> <b>half</b> 8:18 11:19 31:3,4 40:7 <b>hand</b> 90:19 <b>handed</b> 14:1,25 <b>handgun</b> 74:18 <b>hanging</b> 13:23 15:4 19:4 24:14 71:12 <b>hands</b> 57:15,16 <b>happened</b> 21:21,24 42:22 79:20 80:15 <b>hardly</b> 20:6 <b>harm</b> 53:24 63:3,11 77:22 78:1,2 <b>harmed</b> 53:18 67:20,25 68:7,13,21 84:10,13,15 <b>haven't</b> 42:9 <b>having</b> 5:3 16:10 73:8 74:23 86:10	<b>he/she</b> 90:17 <b>head</b> 6:10 <b>heading</b> 15:24 <b>health</b> 25:16 34:12 <b>hear</b> 7:1 38:5 <b>hearings</b> 36:6,13 <b>held</b> 11:17 43:14 45:7 <b>help</b> 33:15 46:3 48:15 50:13 <b>helpful</b> 52:16 <b>helping</b> 46:21 47:4,8,13,15 51:20,21 <b>helps</b> 46:4 53:6 <b>hereby</b> 90:2 91:16 <b>he's</b> 5:17 18:4 52:17,18 56:2 73:16 74:1 81:15 83:23 87:3 <b>Hill</b> 35:21 39:7 <b>Hispanic</b> 24:5 25:16 32:21,22 51:3,7,17,24 60:3 66:14 85:1 <b>Hispanics</b> 24:2 32:22 33:17 59:11 60:2 86:8 <b>history</b> 55:14 56:10,17 <b>hold</b> 10:22 12:3 14:14 31:1 36:15 43:12 45:2 61:21 <b>honest</b> 58:17 <b>Hood</b> 11:8 <b>hour</b> 8:18 <b>hours</b> 8:18 <b>housing</b> 25:15 <b>hundred</b> 17:4 30:24 39:16 40:8 63:18,25 64:2	<b>hung</b> 17:21 <hr/> I <hr/> <b>ID</b> 59:10 60:1,24 61:2,9,11 63:17 64:15,19 66:3 69:20 70:1,3,6 72:3,8,11,14,15,17,1 9 73:3,13,24 74:10,11,12,16,17,24 75:7,20 76:6,9,17,25 77:3,6,10,14,18 81:19 <b>idea</b> 6:11 78:3 <b>identification</b> 61:13 66:23 69:18,19 70:17,23 71:23 72:9 74:19 75:2 81:22 82:10 <b>identified</b> 70:6 <b>identify</b> 64:18 65:2,7,20 67:4,12,19,24 68:5,12,20 69:4,17,25 75:1,6,11,19 76:5,10 77:4,8,12,17,21 <b>identity</b> 17:2,5 90:14 <b>IDs</b> 50:14 60:6,9 70:14 <b>I'll</b> 6:6,19,20 7:1 16:13 19:14 22:10,11 32:8 41:13 55:4 58:16 62:10 68:18 82:21 84:2 <b>illegal</b> 79:23,24 80:1 <b>illnesses</b> 7:17 <b>I'm</b> 5:6 6:7 7:16 9:6 11:15 12:1,7,23 13:23 14:4 15:4 17:8,23 19:4 20:5 22:9 23:9 24:14 27:17,20 28:2,6 30:23 32:12 33:10 37:2,4 40:8,20
--	--	--

<p>41:12,16,17 42:24 44:18 45:23,24 46:25 48:6 49:10,11,17 51:6,14 52:11,13,24 53:11,24 55:12 56:1,18 59:15,16,23 60:8,11 62:2 70:16 71:20 72:13 73:5,17,25 75:14 76:13 80:23 81:13 83:8,19 84:17 85:13,22,23 87:3</p> <p><b>imagine</b> 44:7</p> <p><b>impact</b> 42:14 85:5,9,19 86:7</p> <p><b>impacted</b> 84:23 86:2</p> <p><b>implementation</b> 54:1 67:14,20 68:1,8,14,22 69:6 84:23 85:4,9,11</p> <p><b>implemented</b> 86:4</p> <p><b>important</b> 37:15</p> <p><b>imposed</b> 60:1</p> <p><b>impossible</b> 66:7,11</p> <p><b>inaccurate</b> 72:22</p> <p><b>include</b> 34:10</p> <p><b>included</b> 27:18 49:17</p> <p><b>including</b> 19:15 32:19 86:8</p> <p><b>independence</b> 31:13</p> <p><b>Independent</b> 81:14</p> <p><b>INDEX</b> 3:1</p> <p><b>indicating</b> 21:19</p> <p><b>indirectly</b> 46:25</p> <p><b>individual</b> 23:12 35:7 43:21 48:4 52:19 63:13</p> <p><b>individually</b> 50:21 63:15</p> <p><b>individuals</b> 39:5 62:19</p>	<p><b>influence</b> 25:15 51:2,7,14,17,24 52:3,4,5</p> <p><b>information</b> 19:24 57:16 60:20 68:25 69:16,24 74:25 76:4,23</p> <p><b>informed</b> 50:5</p> <p><b>initiate</b> 21:16 22:5 23:21</p> <p><b>initiating</b> 20:25</p> <p><b>initiation</b> 29:11</p> <p><b>injured</b> 67:13,17 68:6 69:6</p> <p><b>injury</b> 11:10 67:16</p> <p><b>input</b> 22:6</p> <p><b>instance</b> 1:15 66:1</p> <p><b>instructs</b> 7:6</p> <p><b>instrument</b> 90:16</p> <p><b>INTEGRITY</b> 92:16</p> <p><b>intend</b> 63:12</p> <p><b>intended</b> 63:3,11,14 66:13</p> <p><b>intent</b> 14:11 58:7 63:13</p> <p><b>intention</b> 15:13</p> <p><b>interest</b> 18:17 62:5 83:17</p> <p><b>interested</b> 92:11</p> <p><b>interests</b> 27:11 82:17,23 83:10</p> <p><b>introduce</b> 14:19 24:12</p> <p><b>invited</b> 43:4 48:15</p> <p><b>involved</b> 12:9,23 22:2 24:9 32:7 38:1 40:19 47:2 85:15 86:4</p> <p><b>involvement</b> 23:10 83:11</p> <p><b>issue</b> 20:17,18 22:24 23:12 24:6 30:5</p>	<p>46:24 47:1,2,3 49:25 61:1 78:7</p> <p><b>issued</b> 28:12</p> <p><b>issues</b> 12:10 22:17,18,21 23:1 33:15,17 34:25 35:6,23</p> <p><b>it's</b> 5:8 12:3,11,12,20 13:11 15:13 17:4,23 18:9 20:23 21:7 22:13 24:21 25:22 26:2,6 27:8,14,22,24 29:9 30:7,23 31:1,2 32:6,23,24 33:11 36:6 39:15 40:6 41:4,10 43:18 44:9,21 45:24 46:18,24,25 47:1 49:6,17,25 50:19,25 51:19 53:11,15 55:2 56:14,21 57:4 59:24 61:10 62:6,20 71:7 79:24 80:14 82:4</p> <p><b>I've</b> 5:24,25 13:25 22:2 57:2 70:16,17,18 71:9,10 72:21 74:8 83:25</p> <hr/> <p style="text-align: center;">J</p> <hr/> <p><b>j.rich@usdoj.gov</b> 2:16</p> <p><b>job</b> 12:21</p> <p><b>Jodi</b> 1:18 91:15 92:16</p> <p><b>join</b> 14:18 20:11 30:15,20</p> <p><b>joined</b> 33:14</p> <p><b>Jr</b> 2:8</p> <p><b>July</b> 71:17</p> <p><b>June</b> 10:22,24 14:13 67:13,19 72:8 77:4</p> <p><b>JUSTICE</b> 2:13,14</p> <hr/> <p style="text-align: center;">K</p> <hr/> <p><b>kicks</b> 38:10</p>
--	--	---

<b>kids</b> 44:17 46:14 <b>kinds</b> 33:7 <b>knew</b> 20:6,9 82:14 <b>knowledge</b> 16:16,18,19,20,22,25 18:5,7,19,23 20:1 21:23 23:23 30:3 38:16 39:8,19,21 40:24 44:3,5 50:19 54:15 57:15 60:15 64:16,21,23 65:1,14 67:6,10,22 68:4,11 69:2,14 77:1,7,11,15,19 78:2,13 80:13,16 81:1 <b>known</b> 61:14 90:12 <hr/> L <hr/> <b>lack</b> 26:8 63:16 64:14 <b>Lane</b> 92:17 <b>language</b> 14:9 17:14,24 62:24 72:1 <b>Laredo</b> 42:24 <b>largest</b> 64:11 <b>last</b> 58:15 71:9 <b>later</b> 19:2 65:6 84:6 <b>Latin</b> 14:12 15:14 16:12 24:3 25:13,25 <b>Laughter</b> 11:13 66:19 <b>law</b> 2:4 10:5,6 11:3,4,7,9,10,12 24:7 56:17 62:18 67:2 73:14,16 79:21 81:21,22 <b>laws</b> 81:20 82:4 <b>lawsuit</b> 12:23 19:16 20:4,12,15,21,25 21:7,8,16 22:5 23:11,22,25 27:10 54:4,5 57:22 73:14 81:14 82:13,19,24 83:12 85:3,16,18,21	86:3,11,18 <b>lawsuits</b> 20:14 <b>lawyer</b> 83:19 <b>lawyers</b> 76:11 80:21 <b>lead</b> 12:24 <b>leadership</b> 10:15 34:12 <b>leading</b> 73:19 <b>League</b> 14:12 15:14 16:12 25:13,25 <b>learn</b> 49:13 <b>learned</b> 20:4 <b>least</b> 30:3 37:25 45:14 46:15 57:24 <b>leave</b> 21:9 <b>legal</b> 11:15,16 12:5,8,13,14 36:19,23 54:21 58:18 59:5 83:14 92:16 <b>legislation</b> 66:13 <b>legislative</b> 38:18 41:21 <b>legislator</b> 39:6 <b>legislators</b> 35:5 39:9 63:10 <b>legislature</b> 34:23,24 35:19,24 36:6,10,17 37:3,7 39:2,6,20,24 41:2,15 49:23 63:2,4,14 <b>legislatures</b> 35:22 <b>less</b> 9:7 <b>let's</b> 14:14 44:24 45:2 55:7 63:7 65:16 73:21 75:17 <b>letters</b> 14:10 71:19 <b>level</b> 20:15 21:9,10,13 28:16 35:13,14 44:22,23,24 45:6,7,11,15,20 49:1,2 50:13,15,16	54:8,9 80:15 <b>levels</b> 43:15 45:15 46:11,12 80:14 <b>license</b> 70:21 74:17,18 <b>licensed</b> 10:6 <b>line</b> 73:6 83:25 <b>list</b> 76:14,16,21 <b>listed</b> 18:19 51:13 72:15 73:3 74:11 <b>litigation</b> 85:20 <b>little</b> 8:7 9:24 10:11 11:18,19 18:14 27:6 33:3 34:19 47:12 49:5 50:17 53:6,14 <b>live</b> 19:10 41:19 <b>local</b> 31:15 43:15 44:24,25 45:10 46:20 49:2,3 50:13,16,24 54:12 <b>locally</b> 53:5 <b>logistics</b> 52:15 <b>long</b> 9:1,5 11:17 55:14 56:17 84:3 <b>lot</b> 10:15 18:16 35:8 37:5,8 44:16 49:4,6 <b>loud</b> 16:6 <b>lower</b> 80:15 <b>LULAC</b> 4:6 11:14,21,23,24 12:6,8,9,21 13:1,4,5,6,7 14:13 16:13 17:19 18:5,8 20:3,5,16 21:15 22:6 23:19,24 24:1,6,16 25:19,21 26:8,12 27:10,12,21 28:2,3,6,10 29:15,17 30:1 31:6,18,22 32:9,10,16,20,21 33:1,5,9,10,11,12,14 ,18,21 34:3,15,20,22 35:13,17,22
---	--	---

36:8,19,24 37:1,17 38:3,13,17 39:1,10,20,24 40:10,12,13,16,21,25 41:14,18,23 42:5,7 43:2,3,6,8 44:25 45:7 46:2,3,4,8,14,21 47:2,15,19,23 48:8,11,14,18,23 49:16 50:3,7,12 52:7 53:17,22,25 54:1,4,5,12,16,19,23 ,25 57:9 58:3,6,10,25 59:9,12,19,20 63:2,10,16,22,23 64:11,13,18,24 65:2,8,12,21 66:1,2,6,12,25 67:4,8,12,19,24 68:5,12,20 69:4,8,15,23,25 73:10,15,17 74:25 75:6,10,19 76:3,7,12,14,16,22,2 4 77:4,8,12,16,21 78:3,7,14,18,23,24 79:1,2,5,7,11 80:11,12,17 81:1,5,19 82:6,9,17,21,23 83:3,9,17 84:9,12,13,14,22,25 85:2,3,4,8,11,12,15, 17,19 86:1,4,9,13,15,18  <b>lulac.org</b> 24:25  <b>LULAC's</b> 19:15 23:10 25:9 34:25 47:5,24 51:3,8,12,18 57:21  <b>luncheon</b> 48:14 49:8  <hr/> M <hr/> <b>machine</b> 1:19  <b>mainly</b> 11:8  <b>maintain</b> 69:9,10,11	76:14,23  <b>maintained</b> 87:9  <b>majority</b> 27:23  <b>mandatory</b> 44:9  <b>MARC</b> 1:3 2:3 91:3  <b>marked</b> 13:22,24 15:1,3,5 19:3,5 24:13,15 71:11,13 87:9  <b>mass</b> 36:25  <b>master's</b> 10:4  <b>materials</b> 8:17  <b>matter</b> 5:8 28:14 41:4,10 53:4 57:20  <b>matters</b> 12:8 15:24  <b>may</b> 6:23 7:5 22:17 23:7 28:25 35:22 53:5 68:13 69:5 72:9 81:15  <b>maybe</b> 8:18 9:6 13:2 18:9 19:10 37:10 43:15 53:6 64:8  <b>mean</b> 10:15 12:21 16:19 17:4,8,18,20,22 18:3 19:10 20:5 22:19 27:17,22 32:3 33:4 35:6 40:3 47:10,11 49:4 52:13,23 53:23 55:2 58:1,12 60:12 61:10,24 62:3 66:17 67:16 68:15 70:20 72:23 73:6 78:11 80:14 82:2 83:19 86:1  <b>means</b> 7:11 42:14  <b>meant</b> 43:5 73:24 74:10  <b>medications</b> 7:21  <b>meet</b> 34:22 35:5  <b>meeting</b> 22:15 23:2 35:5 49:9	<b>meetings</b> 8:21 21:4 22:16 23:6 39:4 44:6,7,8  <b>member</b> 11:23,24 17:3 23:6,12 26:14 28:2,6,10,14 29:10,12,14,16,25 30:2,10,20 33:5,9 36:19,24 39:20 64:18 65:8,21 66:2 67:12,19,24 68:6,13,20 69:5,17,25 75:1,6,19 76:5,24 77:4,9,13,17,21 80:10 81:19 82:6  <b>members</b> 13:13,14 17:2,5,6,14 22:7,14,21,22 23:3,8,13,25 26:4 27:11,12,23 28:15,24 29:1,2,18,19 30:1 32:10,17,19,24 33:2 34:23 36:11,16 38:17 39:1,2,10,12,16,19 41:18 46:3,6,7,22 48:11,17,24 49:12,15 50:9,13 53:7 63:16,21,22 64:2,11,14,17,24 65:2,12 67:4,8 76:7,17  <b>membership</b> 27:22,24 28:12,18,19 29:5,13 33:8 43:9,24 64:6 69:13,16,24 73:20,21 74:25 76:4,8,14,21,23 77:3  <b>memory</b> 13:11 29:9 36:12 40:6  <b>mention</b> 9:13  <b>mentioned</b> 9:8 10:10 13:3 35:1,12 42:9 44:19  <b>mess</b> 52:24  <b>messing</b> 27:25
--	--	---

<b>met</b> 39:1 <b>method</b> 48:4 <b>methods</b> 55:15 <b>Miguel</b> 1:10,14 3:4 5:2,13 17:16 90:1,6,12 91:12,18 <b>M-I-G-U-E-L</b> 5:13 <b>military</b> 10:1,10 61:1,9,11 70:21 74:19 <b>mind</b> 8:3 <b>minorities</b> 24:2,4,8 33:17 37:7 42:15 47:25 49:21 50:3 66:14 85:2 86:6,7,14,16 <b>minority</b> 17:13,15 24:5 40:14 63:3,11 86:6 <b>minute</b> 13:25 47:14 <b>minutes</b> 9:6 53:15 <b>mission</b> 25:10,13,18,20 34:3 46:23 47:5 48:9 49:16,18,20 50:1,8 51:4,9,12,18 86:12,13,19 <b>misstates</b> 78:10 <b>moment</b> 15:5 16:3 19:6 <b>money</b> 44:15 <b>movement</b> 37:5 <b>moving</b> 18:17 62:5 <hr/> N <hr/> <b>nation</b> 26:2 <b>national</b> 12:11,13 20:14,18,25 21:4,5,8,13,17 22:5 24:18,19,20,22 25:19 26:12,13,15,16 28:2,6,11,12,16 29:3,6,8,10 30:22	35:13 44:4,6,19 45:15 48:18 63:22,24 <b>national-level</b> 21:7 <b>nationwide</b> 12:13 34:24 43:10 <b>naturalization</b> 74:20 <b>nature</b> 52:15 <b>nay</b> 21:5 <b>necessarily</b> 13:1 <b>necessary</b> 36:6 50:14 51:22 64:25 65:3,9 <b>negative</b> 85:5,9,12,19 <b>negatively</b> 84:23 <b>Neil</b> 2:3,4 5:19,20,21 <b>neil@ngbaronlaw.com</b> 2:6 <b>neither</b> 92:6 <b>newspaper</b> 40:2 <b>NI</b> 65:21 <b>nobody</b> 30:2 <b>nodding</b> 6:10 <b>noes</b> 38:9 <b>Non</b> 61:4 <b>noncommissioned</b> 10:14 <b>none</b> 32:6 69:9 <b>nonexpired</b> 61:2,7,8 <b>nonhispanic</b> 61:5 <b>nonHispanic</b> 29:19 <b>nonmembers</b> 46:22 <b>nonprofit</b> 33:11 43:6 <b>nor</b> 92:7,10 <b>northeast</b> 26:18 <b>northwest</b> 26:18 <b>NOTARY</b> 90:23 <b>noted</b> 90:3 <b>notice</b> 4:3,4 8:12 14:11 15:11,13,17	16:11,15,18 56:23 <b>notorious</b> 55:14 56:10 <b>nuclear</b> 10:12,17,18,19 <b>NWB</b> 2:14 <hr/> O <hr/> <b>oath</b> 7:11 90:13 <b>object</b> 7:5 22:9,11 31:21 32:12 52:12 54:21 56:1,2,19 58:14 66:5 68:2,9,16 69:7 73:5 77:23 80:6 84:16 85:13,22 <b>objected</b> 41:7 57:2 <b>objection</b> 31:25 32:8 47:12,18 50:10 52:1 53:19 56:5 57:3,4,10 58:14 59:2,6 60:12,22 61:21,23 62:2,6,10 66:8 67:15 68:23 78:8 81:25 82:25 83:13 85:24 <b>obtain</b> 65:10 66:2 70:19 <b>obviously</b> 17:18 <b>October</b> 34:22 <b>office</b> 1:19 2:4 5:10 11:3,4,5,8,9 90:19 <b>officer</b> 10:14 <b>official</b> 12:6 45:14 <b>Oh</b> 38:4 61:6 <b>okay</b> 5:22 6:4,6,23 7:5,10,15 8:3 9:11,15 11:7,21 13:3,8,21 14:2,18,24 15:7,23 16:9,17 17:7,20 18:12,15,22,25 19:7,17 21:8,22 23:19,24 24:11 25:6,24 26:5 27:10,16,20 28:13 29:23 30:25
--	--	--

<p>31:3,8,18 33:6 34:6  35:12 36:22 38:23  41:23 42:19 44:24  45:1 48:8,11 49:15  51:20 52:21 53:9  55:7 57:19 58:6,24  62:9 64:1,13,24  65:17 71:8,12,24  72:25 73:2  74:1,9,14,22,23  75:14,18,23,25 76:22  80:23 81:18 82:3  83:18,21 84:3  87:16,24 88:2</p> <p><b>old</b> 29:16 30:14</p> <p><b>ones</b> 16:23 26:19</p> <p><b>one-time</b> 29:12</p> <p><b>open</b> 22:16 31:15</p> <p><b>opens</b> 22:24</p> <p><b>operate</b> 27:7</p> <p><b>opinion</b> 2:9 39:25  41:4,10 57:15 78:23</p> <p><b>opinions</b> 35:6</p> <p><b>opportunity</b> 24:11  41:1,14,17</p> <p><b>oppose</b> 37:17 38:3,14</p> <p><b>opposed</b> 37:25</p> <p><b>opposition</b> 38:20  40:11,12 41:1,14</p> <p><b>oral</b> 1:9,14 14:11  15:13 38:17 91:11</p> <p><b>order</b> 28:10 65:9  70:10,15</p> <p><b>organization</b> 20:23  21:24 22:13,15 24:3  25:22 26:1,3  27:15,21,24 31:19,25  32:3 33:20,22 36:12  37:6,13,15,17,25  38:13 41:23 43:5,6  44:13,14,17 45:17  46:18 52:17 53:1,18  59:20 64:5 69:5</p>	<p>77:5,9,13,17,21 82:9  84:10,12,15</p> <p><b>organizations</b> 26:2</p> <p><b>organize</b> 46:11</p> <p><b>original</b> 87:8,20,25</p> <p><b>originate</b> 23:11</p> <p><b>Ortiz</b> 1:10,14 3:4  5:2,13,14,22 7:15  8:3 9:15 10:25 11:3  13:23 14:25 15:8  19:4,8 20:3 24:15  53:17 61:17 65:20  71:12,13 72:14 84:9  86:21 87:3,5,14  90:1,6,12 91:12,18</p> <p><b>O-R-T-I-Z</b> 5:13</p> <p><b>otherwise</b> 92:11</p> <p><b>outcome</b> 92:11</p> <p><b>outside</b> 48:22 56:19  57:4 58:15 59:4  60:13 85:18</p> <p><b>overbroad</b> 77:24</p> <p><b>oversee</b> 26:22</p> <p><b>oversees</b> 27:3</p> <hr/> <p style="text-align: center;">P</p> <hr/> <p><b>p.m</b> 1:17 88:3</p> <p><b>page</b> 3:2 4:2 14:6,9  15:20,21,23 25:7  34:2 51:11 55:12  61:10 71:19 72:21  73:4 74:12,15 92:2</p> <p><b>PAGE/LINE</b> 89:2</p> <p><b>paid</b> 12:17,21 29:13  30:19 81:4,8</p> <p><b>paperwork</b> 48:2</p> <p><b>paragraph</b> 17:1 25:9  34:2,4,6,9 35:1  51:12 55:13 72:6</p> <p><b>paragraphs</b> 15:25  16:1,4</p>	<p><b>partial</b> 31:13</p> <p><b>participate</b> 20:21  45:18 53:2</p> <p><b>participation</b> 34:11  36:7</p> <p><b>particular</b> 13:1 19:2  20:22 21:18 24:6,7  32:4,5,23,24 44:23  57:2 76:20 78:5,12  79:14 81:21</p> <p><b>parties</b> 92:8</p> <p><b>partisan</b> 31:18,25  32:3</p> <p><b>partner</b> 12:9</p> <p><b>party</b> 32:4,5 82:13  91:23 92:5</p> <p><b>pass</b> 49:10,13 87:1</p> <p><b>passed</b> 41:24 42:16</p> <p><b>passport</b> 61:12 70:22  74:18</p> <p><b>Past</b> 75:21</p> <p><b>pay</b> 28:11,23 29:6,7  30:16,21 43:19</p> <p><b>paying</b> 81:11</p> <p><b>pays</b> 29:10</p> <p><b>PC</b> 11:3</p> <p><b>penalty</b> 7:13</p> <p><b>pending</b> 35:23 36:3  49:23</p> <p><b>Pennsylvania</b> 2:14</p> <p><b>people</b> 30:6 32:10,19  35:8 36:4 37:23  46:19,21  47:4,6,8,16,21,22  48:20,21 49:19  50:1,4 51:20  62:20,23 63:6,7,19  78:15,19</p> <p><b>percent</b> 30:24 40:8  64:9</p> <p><b>percentage</b> 64:7,11</p>
---	---	---



<b>period</b> 75:21	7:1 14:1,6 15:5,20	<b>presented</b> 42:19 57:8
<b>perjury</b> 7:13	16:4 19:5,6 25:6	<b>presenter</b> 42:21
<b>permit</b> 61:12	72:6 73:2	<b>presents</b> 24:11
<b>PERRY</b> 1:6 91:6	<b>plus</b> 28:15 30:10	<b>president</b> 26:16,22 27:1,7
<b>person</b> 30:4 63:13 78:24 79:2,3,5,8 90:15	<b>point</b> 23:16,17 24:7 34:7,18 52:24,25 57:12 75:10,11 77:22	<b>presidents</b> 26:14,17
<b>personal</b> 11:10 16:19,20,22,25 21:23 23:23 39:4,8,21 40:24 44:3 50:19 54:15 57:15 60:15 64:16,21,22 65:1,14 67:6,10,22 68:3,11,24 69:2,14 74:17 77:1,7,11,15,19 78:2 80:13,15	<b>points</b> 18:13 73:3	<b>press</b> 37:10
<b>personally</b> 16:24 39:2 79:16,18 90:12	<b>policy</b> 24:9,10	<b>pretty</b> 27:17 37:14 45:23 49:10,12
<b>phone</b> 14:19 53:13	<b>political</b> 25:15 32:5 51:2,7,13,16,23 52:3,5	<b>prevent</b> 7:18,22,25 41:24
<b>photo</b> 72:3 74:19,21	<b>politics</b> 32:7	<b>previous</b> 62:7,11
<b>physical</b> 47:10	<b>polling</b> 52:10	<b>previously</b> 70:4
<b>physically</b> 48:2	<b>population</b> 25:16 51:3,8,17,24 60:4	<b>primarily</b> 33:21
<b>pieces</b> 39:25	<b>portion</b> 59:15	<b>primary</b> 10:15 11:8 47:24
<b>places</b> 52:10	<b>position</b> 12:17,18 39:25 78:7	<b>print</b> 71:14
<b>plaintiff</b> 20:6 83:3 86:3	<b>positions</b> 35:22	<b>printed</b> 71:16
<b>plaintiffs</b> 20:9 23:20 83:6,22	<b>positive</b> 32:22	<b>printout</b> 4:6,7 24:16 71:15
<b>plaintiff's</b> 19:15	<b>possess</b> 69:17 75:1,7,20 76:5 77:5,9,13,18	<b>privilege</b> 23:1
<b>Plaintiffs</b> 1:4 91:4	<b>power</b> 42:4	<b>probably</b> 9:7 27:23 41:5 43:14 46:14
<b>Plaintiff's</b> 4:5	<b>practice</b> 10:6 11:7	<b>problem</b> 84:11
<b>PLAINTIFFS</b> 2:3	<b>prefer</b> 84:5	<b>problems</b> 50:5
<b>plan</b> 48:16,18	<b>preference</b> 84:8	<b>Procedure</b> 1:22
<b>pleading</b> 59:14	<b>premises</b> 24:2	<b>process</b> 21:25 22:1
<b>pleadings</b> 19:10,11 54:24 55:1,2,6,7,22 57:23,24 58:8,21,22 59:8,16 83:5	<b>preparation</b> 15:17 19:21	<b>produced</b> 1:14
<b>please</b> 5:11,12 6:9,18	<b>prepare</b> 8:8,10 9:12 45:11	<b>program</b> 35:10
	<b>prepared</b> 17:19	<b>programming</b> 34:7,10
	<b>presence</b> 78:12	<b>projections</b> 17:12
	<b>present</b> 5:1 14:17 17:15 20:17 21:4,16,20 22:22 23:3,4,15 36:5 75:21	<b>promoted</b> 46:18
	<b>presentation</b> 42:20	<b>propose</b> 40:21
		<b>proposed</b> 20:24
		<b>protect</b> 24:3 86:14
		<b>protected</b> 49:22
		<b>prove</b> 80:3

<p><b>proved</b> 90:13</p> <p><b>provide</b> 33:1 57:16,17</p> <p><b>provided</b> 38:17 60:18</p> <p><b>public</b> 4:7 37:8 49:24 71:16,21 90:23</p> <p><b>publicize</b> 40:12</p> <p><b>publicized</b> 40:10</p> <p><b>publish</b> 39:24</p> <p><b>Puerto</b> 11:6,10 28:15</p> <p><b>purpose</b> 33:15 54:17,20 90:17</p> <p><b>purposes</b> 38:12</p> <p><b>pursuant</b> 1:21 72:16 73:10 91:21</p> <p><b>pursue</b> 21:10,11,12</p> <p><b>pursuing</b> 86:18</p> <p><b>puts</b> 22:25</p> <p><b>putting</b> 8:5</p> <hr/> <p style="text-align: center;"><b>Q</b></p> <hr/> <p><b>question</b> 6:19,25 7:7 38:12 41:6 57:12 58:9,15,20 59:3 62:7,11,14,20 63:1,9 65:11 67:23 70:2 73:19,22 76:9,13 78:1,6 79:10,14 83:9,24 84:11,21 85:23,25</p> <p><b>questioning</b> 73:6</p> <p><b>questions</b> 6:8,9,18 7:6,18,22 8:1 18:11 25:8 46:1 52:14,23 60:13,20 68:19 69:10 73:11,19 84:1 86:21 87:2,15</p> <p><b>quick</b> 6:6 13:25 14:20 16:3 87:13</p> <hr/> <p style="text-align: center;"><b>R</b></p> <hr/> <p><b>race</b> 29:17 55:17 61:19 62:17,23</p>	<p><b>raise</b> 45:2</p> <p><b>rankings</b> 46:19</p> <p><b>rather</b> 84:5</p> <p><b>reading</b> 51:6,10 59:15</p> <p><b>real</b> 14:20 87:13</p> <p><b>realized</b> 23:13</p> <p><b>really</b> 17:23 19:1 32:13 45:17 46:16 57:13 80:9 81:7</p> <p><b>reason</b> 19:23 24:25 53:3 72:20 73:1 76:3 89:2</p> <p><b>reasons</b> 92:2</p> <p><b>recall</b> 36:14,25 37:9,16 70:9</p> <p><b>receipt</b> 91:25</p> <p><b>receive</b> 33:18 43:8,21 72:18</p> <p><b>received</b> 15:11</p> <p><b>recognition</b> 35:3</p> <p><b>recognize</b> 14:3 15:8 19:8</p> <p><b>record</b> 5:12 6:13 14:15,16,25 17:16 18:24 25:3,5 27:25 52:24 53:16 57:7,19 65:16,19 74:3 75:12,16 86:22 87:6,7,12,17 91:20 92:10</p> <p><b>records</b> 58:23 69:9,10,11</p> <p><b>refer</b> 16:13 62:3</p> <p><b>reference</b> 41:25</p> <p><b>referenced</b> 48:23</p> <p><b>referral</b> 30:11</p> <p><b>referring</b> 18:3 37:2 71:20</p> <p><b>regard</b> 6:16 36:9 40:16 42:6,8 57:20</p>	<p><b>regarding</b> 16:15 34:25 37:1 39:25 48:11,24 49:15 50:25 57:21 73:20 86:23</p> <p><b>regardless</b> 23:7 61:19 62:17</p> <p><b>region</b> 26:21</p> <p><b>regional</b> 26:14,17,24,25</p> <p><b>regions</b> 26:20</p> <p><b>register</b> 46:3,21 47:4,6,9,16,22 49:19 60:11</p> <p><b>registered</b> 28:16 46:4 48:20 67:1 78:4,16,19</p> <p><b>registration</b> 46:12,13,17 47:20,21 48:1,9 59:10 60:2 66:24</p> <p><b>regular</b> 11:23 13:18</p> <p><b>regularly</b> 34:15</p> <p><b>related</b> 17:13 73:11 92:7</p> <p><b>relates</b> 56:24</p> <p><b>relating</b> 80:12,18 81:22</p> <p><b>relation</b> 81:2</p> <p><b>relative</b> 92:9</p> <p><b>releases</b> 37:10</p> <p><b>relevance</b> 60:15</p> <p><b>relevant</b> 73:9,12</p> <p><b>rely</b> 76:11</p> <p><b>remember</b> 42:12,17,19,21</p> <p><b>repeat</b> 54:18 63:9 69:22 78:17 82:20</p> <p><b>repetitious</b> 59:3 85:14</p> <p><b>rephrase</b> 7:2</p>
---	---	--

<b>report</b> 80:18 81:2 <b>reported</b> 1:19 <b>reporter</b> 6:12 10:18 29:21,23 61:3,5,8 62:1 65:17 71:1,3,8 87:7,21,24 88:2 91:16 <b>Reporter's</b> 3:6 91:9 <b>reporting</b> 50:22 <b>reports</b> 17:12 26:12 44:5 60:18 <b>represent</b> 19:14 24:15 27:10,12 71:14 72:14,16 73:16 74:11 82:23 <b>representative</b> 73:10 <b>represented</b> 5:16 82:18 83:11 <b>representing</b> 5:7 14:21 23:24 76:12 83:2,16 <b>represents</b> 24:1 25:20 83:9 <b>request</b> 17:11 40:21 57:17 <b>requested</b> 91:23 92:4 <b>require</b> 29:17,18 <b>required</b> 7:7 51:1 60:9 69:20 70:4,7,10 73:13 74:12,23 76:18 77:2 <b>requirement</b> 59:9,10,25 66:22,25 69:11 <b>requirements</b> 48:12,25 49:16 50:9 51:21 60:5,16,24 61:18 62:16 81:23 <b>requires</b> 70:15,19 73:18 <b>requiring</b> 80:3 <b>research</b> 40:21	<b>reserve</b> 87:2 <b>reside</b> 5:14 64:14 <b>residents</b> 64:2 <b>resolved</b> 21:3 <b>resources</b> 54:2,6,13 85:5,12,16,19 86:2,5,10 <b>respectful</b> 33:19 <b>respond</b> 56:22 <b>responds</b> 44:22 <b>response</b> 56:6 <b>responsibilities</b> 12:6 <b>responsible</b> 12:7 <b>rest</b> 15:2 <b>restate</b> 7:2 38:7,12 62:10 67:18 <b>result</b> 32:22 33:12 67:13,20 68:1,7 69:6 <b>returned</b> 91:24 92:1 <b>review</b> 8:13 15:17 16:3,10 88:1 <b>reviewing</b> 8:16 <b>Rich</b> 2:13 5:1 14:17,21 87:15,18 <b>RICK</b> 1:6 91:6 <b>Rico</b> 11:6,10 28:15 <b>rides</b> 52:10 <b>rights</b> 23:24 24:3,8 25:16 32:6 34:11 44:14 47:1,24 48:10 49:21 66:13 86:6,14,15 <b>role</b> 11:14,17,21 <b>Room</b> 2:14 <b>RPR</b> 1:18 91:15 92:16 <b>rule</b> 27:9 91:21 <b>rules</b> 1:21 6:6 44:10 <hr/> S	<b>Safety</b> 4:8 71:16,21 <b>San</b> 5:15 11:4,5,9 <b>sarcastic</b> 53:23 <b>SB14</b> 17:13 36:17 37:2,14,17 38:14 39:3,23 40:1,11,16,22 41:1,15,24 42:8,11 48:16 50:14 53:18 54:1,16,19 56:4 58:6 59:1 60:1,5,10,16 61:18 62:16,22 63:3,8,11,17 64:15,20 66:3,6 67:5,9,14,21 68:1,8,14,22 69:6,17,19,21 70:1,4,7,10,14 72:16 73:14,18,25 74:10,13,16,24 75:2,8,20 76:5,18,25 77:6,10,14,18,22 82:7 84:10,15,24 85:5,9,12,19 86:7 <b>SB14-related</b> 37:1 54:7,14 <b>SBC</b> 86:4 <b>scaling</b> 49:13 <b>schedules</b> 35:5 <b>scholarships</b> 43:19 44:15,16 <b>school</b> 10:15,16 <b>scope</b> 56:20 57:5 58:15 59:4 60:13 <b>screen</b> 24:16 71:14 <b>seal</b> 90:19 <b>second</b> 10:22 13:9 15:2 25:4 61:22 73:8 <b>SECTION</b> 2:14 <b>seek</b> 22:4 <b>seem</b> 59:3 60:13,19 <b>seems</b> 56:19 83:14
--	--	--

<p><b>seen</b> 19:18 70:16,17,18,24 74:8</p> <p><b>Senate</b> 36:9 37:2 55:17,23 60:23 66:16,18,22 84:25 86:16</p> <p><b>Send</b> 87:25</p> <p><b>sent</b> 87:20</p> <p><b>sentences</b> 55:19</p> <p><b>separate</b> 85:24</p> <p><b>separation</b> 27:13,14</p> <p><b>September</b> 9:18</p> <p><b>series</b> 15:25</p> <p><b>seriously</b> 60:12</p> <p><b>serve</b> 32:16</p> <p><b>serves</b> 13:11 29:9 36:12 40:6</p> <p><b>services</b> 33:1,4,7</p> <p><b>session</b> 38:18 41:21</p> <p><b>sets</b> 45:21</p> <p><b>setup</b> 73:19</p> <p><b>seven</b> 26:19,22</p> <p><b>several</b> 16:21</p> <p><b>shaking</b> 6:10</p> <p><b>share</b> 84:7</p> <p><b>shared</b> 25:20,22</p> <p><b>short</b> 59:16</p> <p><b>Shorthand</b> 91:16</p> <p><b>shot</b> 24:16</p> <p><b>shown</b> 74:1</p> <p><b>sic</b> 34:23</p> <p><b>signature</b> 87:20 89:1 90:2 91:22 92:2</p> <p><b>Signature</b>..... .....89 3:6</p> <p><b>similar</b> 22:3 35:13</p> <p><b>simple</b> 30:7</p>	<p><b>single</b> 61:25 69:5 77:9,13,17</p> <p><b>sir</b> 6:15,22 7:4,9,14 8:6 10:7,9 15:16,19,22 16:2 34:5,8 55:11,20 82:15</p> <p><b>sit</b> 50:23 75:22</p> <p><b>site</b> 24:17 25:19 51:6 71:15</p> <p><b>Site</b>..... .....71 4:8</p> <p><b>Site</b>..... ...24 4:6</p> <p><b>sitting</b> 58:24</p> <p><b>situation</b> 12:25 53:4</p> <p><b>six</b> 17:4 26:18</p> <p><b>skills</b> 33:16</p> <p><b>Slaughter</b> 92:17</p> <p><b>slow</b> 42:1</p> <p><b>small</b> 45:14</p> <p><b>SOLUTIONS</b> 92:16</p> <p><b>someone</b> 14:18 43:1,3 47:8 48:15 69:13 78:25 79:4 80:3 81:8</p> <p><b>somewhat</b> 21:25</p> <p><b>Somewhere</b> 12:2</p> <p><b>sooner</b> 84:5</p> <p><b>sorry</b> 19:12 39:22 66:17</p> <p><b>sort</b> 12:12 42:10,13</p> <p><b>source</b> 60:20</p> <p><b>southeast</b> 26:18</p> <p><b>SOUTHERN</b> 1:1 91:1</p> <p><b>southwest</b> 26:17,25</p> <p><b>Spanglish</b> 38:10</p> <p><b>speak</b> 6:12</p> <p><b>speaks</b> 73:7</p>	<p><b>specialist</b> 10:12</p> <p><b>specific</b> 33:3 42:13 45:16 48:18 49:25 50:1 52:4 59:15 66:1 76:8,19</p> <p><b>specifically</b> 7:6 18:3 23:17 35:18 54:6 55:25 56:23 57:14 69:9</p> <p><b>specifics</b> 37:12</p> <p><b>specify</b> 66:1</p> <p><b>specifying</b> 69:9</p> <p><b>spell</b> 5:12</p> <p><b>spend</b> 8:16</p> <p><b>spending</b> 44:11</p> <p><b>spent</b> 54:3</p> <p><b>split</b> 30:22</p> <p><b>sponsor</b> 30:11</p> <p><b>sponsored</b> 81:4</p> <p><b>sponsorship</b> 30:15</p> <p><b>sponsorships</b> 43:11,25</p> <p><b>standing</b> 30:10 39:14,17</p> <p><b>start</b> 63:7 75:14,17</p> <p><b>state</b> 1:18 5:11 10:8 11:15,16 12:5,13,15 13:8,12 18:23 21:2,3,9,10 22:18,21 24:18 26:10,11 27:2,3,11,24 28:11,18 29:3,8 30:22,23 31:5,7,9,11 35:9,14 36:1 41:13 44:20,21 45:6,7,10,15,16,21 49:2,8,11 50:12,16,20 52:25 53:2 54:9 55:14 60:4 61:24 64:5 66:14 73:15 82:21 90:8,24 91:16</p> <p><b>stated</b> 26:7 47:5,14</p>
---	--	---

<p>49:16,17,18 51:4,8,18 74:9</p> <p><b>state-level</b> 13:16 21:7 44:7</p> <p><b>states</b> 1:1 2:13,14 9:20 10:13 14:22 25:17 26:23 28:15 31:11 51:3,8,12,18,25 55:13 64:10 82:12,19,22 83:2,9,11,16 91:1</p> <p><b>statewide</b> 18:8</p> <p><b>State-wise</b> 49:7</p> <p><b>Statistics</b> 80:24</p> <p><b>statute</b> 62:24 63:1</p> <p><b>stenotype</b> 1:19</p> <p><b>Stephen</b> 2:8 5:6 62:12</p> <p><b>stephen.tatum@texasattorneygeneral.gov</b> 2:11</p> <p><b>steps</b> 50:21</p> <p><b>Steve</b> 52:13</p> <p><b>stipulated</b> 87:8</p> <p><b>stop</b> 72:13</p> <p><b>Street</b> 1:20 2:9</p> <p><b>strong</b> 43:10 44:14</p> <p><b>structure</b> 22:13 31:12</p> <p><b>subject</b> 7:12 37:15 56:5 57:3,10 59:6 60:22 73:14 78:13 85:24</p> <p><b>subjects</b> 10:17,18 34:25</p> <p><b>subscribed</b> 90:16 92:12</p> <p><b>suffered</b> 77:22</p> <p><b>suffering</b> 7:17</p> <p><b>sufficient</b> 69:16,24 74:25 76:4,23</p>	<p><b>suing</b> 73:15</p> <p><b>suit</b> 19:11 86:2</p> <p><b>Suite</b> 2:4 92:17</p> <p><b>support</b> 33:16 36:4 78:3 81:19 82:7 92:16</p> <p><b>supported</b> 82:10</p> <p><b>supporting</b> 30:5 49:23</p> <p><b>sure</b> 7:3 9:6 11:20 12:1 14:4 16:7 17:9,25 18:6,17 20:5 25:1 27:17 30:24 37:4 40:8,15 41:12,16,17 42:24 45:23,25 46:25 49:10,12,17 54:19 55:4 62:13 69:23 74:10 76:13 78:15,18,20 79:2,8,19 82:21 83:8 85:8,23 87:3</p> <p><b>sworn</b> 1:16 5:3 91:18 92:12</p> <hr/> <p style="text-align: center;">T</p> <hr/> <p><b>table</b> 8:5</p> <p><b>taking</b> 7:21 17:24</p> <p><b>talk</b> 36:4</p> <p><b>talked</b> 32:9 44:1 70:3</p> <p><b>talking</b> 6:16,24 37:5,8 63:18 81:4 83:19</p> <p><b>talks</b> 34:9</p> <p><b>targeted</b> 60:3</p> <p><b>Tatum</b> 2:8 5:5,6 10:20 11:14 13:23 14:18,23,24 15:4 18:12 19:4 23:9 24:14,20 25:3,6 28:8 30:12 32:2,9,15 36:18 38:7,11 41:13 47:14 48:8 50:12 52:7,21 53:5,17,25</p>	<p>55:4 56:13,21 57:19 58:19 59:13 60:25 61:14 62:8,13,15 65:18,20 66:6,20 67:18 68:5,12,18 69:4,15 70:25 71:2,6,9,12 73:12,23 74:3,7 78:3,14 80:10 81:18 82:3 83:4,18,25 84:7,9,22 85:18 86:9 87:1,5,10,13,16</p> <p><b>Tatum</b>..... .....5 3:5</p> <p><b>TCRR</b> 91:15</p> <p><b>team</b> 76:11</p> <p><b>telephone</b> 2:13 14:17</p> <p><b>ten</b> 29:1</p> <p><b>terms</b> 81:24 82:2</p> <p><b>testified</b> 5:3 36:12,17 38:16 47:17</p> <p><b>testify</b> 16:14 18:20 36:5 37:23 41:18 58:3</p> <p><b>testimony</b> 38:17 41:19 57:21 60:19 70:9 74:24 75:4 78:10 84:14 91:20 92:8</p> <p><b>Texas</b> 1:1,18,20,21 2:5,10 4:7 5:10,15 9:19,21 10:8 11:16 12:5,14 13:5,6,7,12 20:17,24 21:15 22:6 25:20 26:7 27:11,18,23 28:2,17 31:5,10 35:18 39:2,9,20 41:2,15 43:4 46:15 50:20 52:17 55:14 56:10 60:4 61:11,18 63:2,4,10,23 64:2,5,10,14 67:1 71:15,21 72:2,3,4 74:17,18 78:14,18,20,21 79:7</p>
---	--	--

<p>91:1,16 92:16,17</p> <p><b>text</b> 62:22</p> <p><b>thank</b> 8:7 14:23 62:12 87:5,15 88:2</p> <p><b>that's</b> 12:21 13:13 14:9,25 15:11 17:20 18:1 20:16,22,23 24:9 28:14,24 29:11 36:23 38:1,2,22,25 43:7,11 45:19 47:16,23 49:20 53:24 55:22 57:6,11,12,24 59:11 65:18 69:20 73:14,15 78:23 84:17 85:2 87:18</p> <p><b>themselves</b> 23:13 27:7 81:6</p> <p><b>thereabouts</b> 5:9</p> <p><b>therefor</b> 92:3</p> <p><b>therein</b> 90:18</p> <p><b>there's</b> 12:23 15:23 16:21 25:7,9,22 26:3,24,25 27:13 28:8 30:13 35:8 44:21,22,25 45:6,13,14 49:4,5 50:22,23 60:17 69:12</p> <p><b>they're</b> 20:9,20 22:16 26:14,19 31:12 46:16 80:4 83:3,6,20,22</p> <p><b>thousand</b> 17:5 39:16 49:5,6 63:19,25 64:2</p> <p><b>throughout</b> 26:2 46:18</p> <p><b>title</b> 25:7 71:20</p> <p><b>today</b> 5:16 6:14 7:15 8:9,20 9:9 37:24 39:17 58:4,24 86:22,23</p> <p><b>today's</b> 68:13,21 77:16,20</p> <p><b>top</b> 71:19</p> <p><b>topic</b> 17:10 19:2 56:24</p>	<p><b>topics</b> 16:10,15,17 18:18</p> <p><b>total</b> 45:3</p> <p><b>totally</b> 18:6</p> <p><b>touched</b> 84:1</p> <p><b>toward</b> 34:3</p> <p><b>towards</b> 54:2,13 85:20 86:10</p> <p><b>transcribe</b> 6:13</p> <p><b>transcript</b> 87:8 91:19,25</p> <p><b>transparency</b> 44:10</p> <p><b>transporting</b> 53:3</p> <p><b>treasurer</b> 13:10 44:4,19,20,21,22</p> <p><b>trial</b> 87:3</p> <p><b>tried</b> 34:22 73:23</p> <p><b>true</b> 56:13,14 90:2 91:19</p> <p><b>trust</b> 24:22</p> <p><b>truth</b> 7:11</p> <p><b>truthful</b> 16:14</p> <p><b>truthfully</b> 7:18,22 8:1</p> <p><b>try</b> 6:16 35:21 53:22</p> <p><b>trying</b> 23:10 27:20 52:13,24 73:17,25</p> <p><b>turn</b> 14:6 15:20</p> <p><b>two-second</b> 53:12</p> <p><b>type</b> 21:13 62:2</p> <p><b>types</b> 70:6</p> <p><b>typically</b> 43:14</p> <hr/> <p style="text-align: center;">U</p> <hr/> <p><b>uh-huh</b> 6:11,15 24:24 35:25 43:17</p> <p><b>ultimate</b> 45:8</p> <p><b>unable</b> 57:20 58:24</p>	<p>66:3</p> <p><b>underneath</b> 34:6</p> <p><b>understand</b> 6:14,21,25 7:3,8,10 16:7 17:10,11 18:6 32:2,13 50:4 57:1 60:14 70:2 73:24 83:15</p> <p><b>understanding</b> 27:21 38:22,25 39:11</p> <p><b>understands</b> 73:18</p> <p><b>Understood</b> 38:11</p> <p><b>undertake</b> 41:23</p> <p><b>United</b> 1:1 2:13,14 9:20 10:13 14:12,21 15:14 16:12 25:13,17,25 51:3,8,17,24 82:12,18,22 83:2,8,11,16 91:1</p> <p><b>university</b> 46:15</p> <p><b>unlawful</b> 55:18</p> <p><b>unless</b> 7:6 55:2 62:3 72:4</p> <p><b>usually</b> 22:18 28:24 29:1 30:3</p> <hr/> <p style="text-align: center;">V</p> <hr/> <p><b>Vacation</b> 11:12</p> <p><b>vague</b> 41:8 47:13 68:9,16 69:1,7 77:23 82:25</p> <p><b>vagueness</b> 32:1</p> <p><b>various</b> 52:19 55:15</p> <p><b>VEASEY</b> 1:3 2:3 91:3</p> <p><b>verbal</b> 6:9</p> <p><b>via</b> 2:13 14:17</p> <p><b>vice</b> 13:8 26:14,16,21,22 27:1</p> <p><b>view</b> 27:9</p> <p><b>views</b> 47:24 49:24</p>
---	--	---



<p><b>voice</b> 41:1,14</p> <p><b>Voicing</b> 38:20</p> <p><b>voluntary</b> 12:20</p> <p><b>volunteer</b> 33:10,22</p> <p><b>vote</b> 20:19 21:5 22:25 36:3 46:3,5,22 47:5,6,9,16,22,23 48:21 49:19,22 50:14 51:20,22 53:22 66:7,24 67:5,9 69:20 70:7,11 72:3 74:12 78:4,15,19,22,25 79:3,5,6,8 80:4 84:13 85:1 86:8</p> <p><b>voted</b> 23:17 63:6,7,11</p> <p><b>voter</b> 46:17 47:20 48:1,9 49:15 59:10 60:1 66:24 79:11,17,22 80:2,5,12,19 81:2,19,22 82:10</p> <p><b>voters</b> 17:14 52:7 55:15,16,24 56:11 67:1 72:2,3 78:4,16,19</p> <p><b>votes</b> 70:15 82:4</p> <p><b>voting</b> 2:14 46:12 47:1,19 48:12,24 50:1,9 51:21 53:7 66:13</p> <p><b>VS</b> 1:5 91:5</p> <hr/> <p style="text-align: center;">W</p> <hr/> <p><b>wait</b> 6:20</p> <p><b>waive</b> 87:20,21</p> <p><b>Washington</b> 2:15 35:3</p> <p><b>wasn't</b> 21:20 23:14 37:22</p> <p><b>waste</b> 73:8</p> <p><b>ways</b> 52:3</p> <p><b>weapons</b> 61:12</p> <p><b>Web</b> 4:6,8 24:16 25:19</p>	<p>51:6 71:15</p> <p><b>week</b> 41:11</p> <p><b>we'll</b> 17:7 19:1 31:4</p> <p><b>well-being</b> 40:13</p> <p><b>we're</b> 5:9 21:8,11,12 84:3</p> <p><b>West</b> 1:20 2:4,9 92:17</p> <p><b>we've</b> 14:18 43:9 74:1 84:1</p> <p><b>whatever</b> 7:2 21:3 22:17,21 23:7 30:5 33:12,15 46:13 49:24</p> <p><b>whenever</b> 33:16</p> <p><b>whether</b> 18:4,8 20:1,20 22:4 23:8 36:3 39:4 40:2 41:4,16 42:16 48:2,16 49:22 56:10 64:16,22 65:14 73:17 75:10,25 76:2,9,24 79:15 83:8</p> <p><b>whole</b> 6:11 10:13 25:22 32:18 33:13,17 49:9 62:24 63:1,4 72:12</p> <p><b>whomever</b> 24:5 81:11</p> <p><b>who's</b> 39:17</p> <p><b>whose</b> 90:15</p> <p><b>withdraw</b> 32:8</p> <p><b>witness</b> 1:15 10:19 17:17,22 18:1,6,9 22:12 24:19 28:4,7 29:22,24 31:22 32:13 36:15 38:4,9 41:10 47:19 50:11 52:2 53:2,12,20 54:23 56:3,7 57:6,8,9,11 58:16 59:8 60:24 61:4,7,9 62:14 66:9,12,17 67:16 68:3,10,17,24 69:2,8 71:5 74:5 77:25 78:9,11 80:7 81:17</p>	<p>82:1 83:1,15 84:17,20 85:15,25 87:1 91:18,20</p> <p><b>witness's</b> 60:15</p> <p><b>work</b> 12:19,25 30:6 34:3</p> <p><b>works</b> 20:23</p> <p><b>worry</b> 83:24</p> <p><b>Wow</b> 11:25 26:19</p> <p><b>write</b> 39:24</p> <p><b>written</b> 17:24 39:24 58:21</p> <hr/> <p style="text-align: center;">Y</p> <hr/> <p><b>y'all</b> 43:12,21</p> <p><b>yea</b> 21:5</p> <p><b>yesterday</b> 8:20,25 9:2,4 65:6</p> <p><b>yet</b> 72:13</p> <p><b>you'll</b> 46:19 62:6</p> <p><b>young</b> 44:17</p> <p><b>yourself</b> 6:2 14:19</p> <p><b>youth</b> 35:3</p> <p><b>you've</b> 6:2 16:11 22:12 28:10 29:5,7 43:9 58:2,3 74:7,9</p>
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